


White- EPA File Copy (original) Yellow- Applicant Copy

 EPA United States Environmental Protection Agency Washington, DC 20460		<input checked="" type="checkbox"/> Registration <input type="checkbox"/> Amendment <input type="checkbox"/> Other:	OPP Identifier Number
Application for Pesticide - Section I			
1. Company/Product Number 70506-4		2. EPA Product Manager Laura Bacon	
4. Company/Product (Name) Permethrin Technical		3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted	
5. Name and Address of Applicant (Include ZIP Code) United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	
Section - II			
<input type="checkbox"/> Amendment – Explain below. <input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application <input type="checkbox"/> Notification - Explain below. <input checked="" type="checkbox"/> Other - Explain below			
Explanation: Use additional page(s) if necessary. (For Section I and Section II.) Submission of alternate CSF and preliminary analysis of five batches to qualify an alternate manufacturing site.			
Section - III			
1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No *Certification must be submitted	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" Unit Packaging wgt. No. per container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" Package wgt. No. per container	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input checked="" type="checkbox"/> Other (Specify)
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container bulk		5. Location of Label Directions <input type="checkbox"/> On Label <input checked="" type="checkbox"/> On labeling accompanying product
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Other _____ <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			
Section - IV			
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)			
Name Sherry B. Hutcheson		Title Sr. Regulatory Manager	Telephone No. (Include Area Code) 229-247-9041
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature <i>Sherry B. Hutcheson</i>		3. Title Sr. Regulatory Manager	
4. Typed Name Sherry B. Hutcheson		5. Date December 28, 2016	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
1200 Pennsylvania Avenue, N.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collection Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the completed form to this address.

Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number UPI, 630 Freedom Business Center, Suite 402, King of Prussia, PA 19406, 229-247-9041	EPA Registration Number/File Symbol 70506-4
Active Ingredient(s) and/or representative test compound(s) Permethrin	Date 12/28/2016
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) food, non-food, terrestrial,	Product Name PermethrinTechnical

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐

I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

☒

I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

☐

I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒

I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature <i>Sherry B. Hutcheson</i>	Date 12/28/2016	Typed or Printed Name and Title Sherry B. Hutcheson, Sr. Regulatory Manager
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Commercial/financial information may be entitled to confidential treatment



Receipt

Your payment is submitted

Pay.gov Tracking ID: 25UO7DAK

Agency Tracking ID: 75120269506

Form Name: Pesticide Registration Improvement Act - Prepayment

Application Name: PRIA Service Fees

Payment Information

Payment Type: Bank account (ACH)

Payment Amount: \$13,226.00

Transaction Date: 10/31/2016 02:35:53 PM EDT

Payment Date: 11/01/2016

Registration Number: 70506-4

Company Name: United Phosphorus, Inc.

Company Number: 70506

Action Code: R351

Account Information

Account Holder Name: United Phosphorus, Inc.

Routing Number: [REDACTED]

Account Number: *****2762

Email Confirmation Receipt

Confirmation Receipts have been emailed to:

sherry.hutcheson@uniphos.com

wes.daughtry@uniphos.com



United Phosphorus, Inc.

Sherry B. Hutcheson
630 Freedom Business Center, Suite 402
King of Prussia, PA 19406
Phone: (229) 247-9041

June 15, 2016

Document Processing Desk
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460-0001

Attn: Meridith Fry (Acting PM 4)

Subject: Permethrin Technical (EPA Reg. No. 70506-4) Notification

Dear Dr. Fry,

Per your email dated June 10, 2016, United Phosphorus, Inc. (UPI) is submitting a notification for our product, Permethrin Technical (EPA Reg. No. 70506-4) to correct the statement regarding broadcast uses.

Included with this letter are the following:

- Application form, EPA Form 8570-1
- One copy of the label, marked for changes
- One copy of the label, clean

If you have any questions, please feel free to contact me at either 229-247-9041 or sherry.hutcheson@uniphos.com.

Best regards,

Sherry B. Hutcheson

Sherry B. Hutcheson
Regulatory Affairs Manager



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.

WASHINGTON, D.C. 20460

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DATA MATRIX ADDRESSING GENERIC AND PRODUCT SPECIFIC REQUIREMENTS OF THE DATA CALL-IN FOR PRODUCTS CONTAINING PERMETHRIN

Date: December 28, 2016	EPA Reg No./ File Symbol: 70506-4	Page 1 of 3
Applicant's/Registrant's Name and Address: United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406	Product: Permethrin Technical	
Ingredient: Permethrin		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
PRODUCT SPECIFIC					
830.1550	Product identity, composition	44841201	UPI	Own	
830.1600	Description of materials Used to Produce the Product	44841201	UPI	Own	
830.1620	Production Process	44841201	UPI	Own	
830.1670	Discussion of Formation of Impurities	44841201	UPI	Own	
830.1700	Preliminary Analysis	44841201 and 50127101	UPI	Own	
830.1750	Certification of Limits	44841201	UPI	Own	
830.1800	Analytical Method	44841201	UPI	Own	
830.6302	Color	44841202	UPI	Own	
830.6303	Physical state	44841202	UPI	Own	
830.6304	Odor	44841201	UPI	Own	
830.6313	Stability	44841202	UPI	Own	
830.6314	Oxidizing/Reducing action	44841202	UPI	Own	
830.6315	Flammability	44841202	UPI	Own	
830.6316	Explosibility	44841202	UPI	Own	
830.6317	Storage Stability	48881501	UPI	Own	
830.6319	Miscibility	44841202	UPI	Own	
830.6320	Corrosion Characteristics	48881501	UPI	Own	
830.6321	Dielectric Breakdown Voltage			Not required	Product is not used around electrical equipment.
830.7000	pH	44841202	UPI	Own	
830.7050	UV/Vis	44841202	UPI	Own	

Signature <i>Sherry B. Hutcherson</i>	Name and Title Sherry Hutcherson, Sr. Regulatory Manager	Date 12/28/2016
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Ingredient: Permethrin		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7100	Viscosity	44841202	UPI	Own	
830.7200	Melting Point			Not Required	Product is a liquid.
830.7220	Boiling Point/Range	44841202	UPI	Own	
830.7300	Density, bulk density, specific gravity	44841202	UPI	Own	
830.7370	Dissociation Constant in water			Not required	No significant acidic or basic moieties
830.7550/7570	Octanol/water Partition coefficient	44841202	UPI	Own	
830.7840/7860	Water Solubility	44841202	UPI	Own	
830.7950	Vapor Pressure	44841202	UPI	Own	
870.1100	Acute oral toxicity	242899	FMC	Own	
870.1200	Acute dermal toxicity – rat	242899	FMC	Own	
870.1300	Acute inhalation toxicity – rat	41031103	Amvac	OLD	
870.2400	Eye irritation	242899	FMC	Own	
870.2500	Skin irritation	242899	FMC	Own	
870.2600	Skin sensitization			Not required	RED does not require
GENERIC					
875.1400	Inhalation exposure – indoor		Permethrin Data Group II		Task Force
860.1380	Storage Stability Data		PDGII		Task Force
860.1500	Crop field trials (CABBAGE)		PDGII		Task Force
860.1500	Crop field trials (COLLARDS)		PDGII		Task Force
860.1500	Crop field trials (GRASS, FORAGE)		PDGII		Task Force
860.1500	Crop field trials (LETTUCE, LEAF)		PDGII		Task Force

Signature <i>Sherry B. Hutcherson</i>	Name and Title Sherry Hutcherson, Sr. Regulatory Manager	Date 12/28/2016
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860.1500	Crop field trials (PEAR)		PDGII		Task Force
860.1500	Crop field trials (TOMATO)		PDGII		Task Force
870.6300	Developmental neurotoxicity study		PDGII		Task Force
SS850.1000	Chronic freshwater sediment testing		PDGII		Task Force
SS850.1000	Chronic estuarine/marine sediment testing		PDGII		Task Force

Signature <i>Sherry B. Hutcheson</i>	Name and Title Sherry Hutcheson, Sr. Regulatory Manager	Date 12/28/2016
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Date: December 28, 2016	EPA Reg No./ File Symbol: 70506-4	Page 1 of 3
Applicant's/Registrant's Name and Address: United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406	Product: Permethrin Technical	
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830.6321	Dielectric Breakdown Voltage			Not required	Product is not used around electrical equipment.
830.7000	pH	44841202	UPI	Own	
830.7050	UV/Vis	44841202	UPI	Own	

Signature <i>Sherry B. Hutcheson</i>	Name and Title Sherry Hutcheson, Sr. Regulatory Manager	Date 12/28/2016
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830.7550/7570	Octanol/water Partition coefficient	44841202		Own	
830.7840/7860	Water Solubility	44841202		Own	
830.7950	Vapor Pressure	44841202		Own	
870.1100	Acute oral toxicity	242899		Own	
870.1200	Acute dermal toxicity – rat	242899		Own	
870.1300	Acute inhalation toxicity – rat	41031103		OLD	
870.2400	Eye irritation	242899		Own	
870.2500	Skin irritation	242899		Own	
870.2600	Skin sensitization			Not required	RED does not require
GENERIC					
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Signature <i>Sherry B. Hutcheson</i>	Name and Title Sherry Hutcheson, Sr. Regulatory Manager	Date 12/28/2016
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Signature <i>Sherry B. Hutcheson</i>	Name and Title Sherry Hutcheson, Sr. Regulatory Manager	Date 12/28/2016
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United Phosphorus, Inc.

Sherry B. Hutcheson
630 Freedom Business Center, Suite 402
King of Prussia, PA 19406
Phone: (229) 247-9041

December 28, 2016

MRID 50127100

Document Processing Desk
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460-0001

Attn: Laura Bacon (PM 4)

Subject: Permethrin Technical alternate manufacturing location (EPA Reg. No. 70506-4)

Dear Ms. Bacon,

United Phosphorus, Inc. is submitting an application for an alternate manufacturing site of our Pemethrin technical (EPA Reg. No. 70506-4) under R351.

In addition to this transmittal letter, we are supplying:

- an application form 8570-1,
- copy of payment for R351
- two copies of the alternate CSF,
- one copy of the basic CSF on file,
- one copy of the study as indicated below.

MRID No.	Guideline No.	Study No.	Study Title
50127101	830.1700 830.1800	11639	(2016) Hutcheson, S. Permethrin Technical: Preliminary Analysis of Five Analysis, pp. 475.

If you have any questions, please feel free to contact me at either 229-247-9041 or sherry.hutcheson@uniphos.com.


Best regards,

Sherry B. Hutcheson

Sherry B. Hutcheson
Sr. Regulatory Manager

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4. Company/Product (Name) Permethrin Technical		3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted	
5. Name and Address of Applicant (Include ZIP Code) United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	
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Explanation: Use additional page(s) if necessary. (For Section I and Section II.)			
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Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No *Certification must be submitted	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" Unit Packaging wgt. No. per container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" Package wgt. No. per container	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input checked="" type="checkbox"/> Other (Specify)
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6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Other _____ <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			
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Name Sherry B. Hutcheson		Title Sr. Regulatory Manager	Telephone No. (Include Area Code) 229-247-9041
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature <i>Sherry Hutcheson</i>		3. Title Sr. Regulatory Manager	
4. Typed Name Sherry B. Hutcheson		5. Date September 28, 2017	

White- EPA File Copy (original) Yellow- Applicant Copy

 Environmental Protection Agency United States Washington, DC 20460	<input type="checkbox"/> Registration <input checked="" type="checkbox"/> Amendment <input type="checkbox"/> Other	OPP Identifier Number _____
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Application for Pesticide – Section I

1. Company/Product Number 70506-04	2. EPA Product Manager B. Fertich	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) UPL NA Inc./ Permethrin Technical	PM# 4	
5. Name and Address of Applicant (include ZIP Code) UPL NA Inc. c/o Pyxis Regulatory Consulting Inc. 4110 136 th St. Ct. NW Gig Harbor, WA 98332		6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____

Section - II

<input checked="" type="checkbox"/> Amendment – Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input type="checkbox"/> Notification – Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> “Me Too” Application. <input type="checkbox"/> Other – Explain below.
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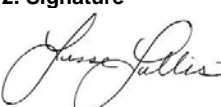
Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

Non-PRIA Fast Track label amendment to add approved food uses to the label. Since no data are being submitted with this amendment and no data need to be reviewed to support this amendment, this action does not qualify as a PRIA action and no PRIA fee is required. Please contact me (Jesse@PyxisRC.com, (253)853-7369) if you have any questions or need any additional information.

Section - III

1. Material This Product Will Be Packaged In:					
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
* Certification must be submitted		If “Yes” Unit Packaging wgt. _____	No. per container _____	If “Yes” Package wgt. _____	No. per container _____
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container _____		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Other _____ <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled					

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Jesse Lollis	Title Agent	Telephone No. (Include Area Code) (253) 853-7369
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Agent	
4. Typed Name Jesse Lollis	5. Date Mar. 06, 2019	



David L. Olson
630 Freedom Business Center, Suite 402
King of Prussia, PA 19406
(610) 491-2814
dave.olson@uniphos.com

January 11, 2019

To Whom It May Concern:

Re: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Pyxis Regulatory Consulting, Inc. is authorized to act as Consultant for UPL NA Inc., EPA Company Number 70506, before the U.S. Environmental Protection Agency and state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), 7 U.S.C. § 136 et seq. and state law.

If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "David L. Olson".

David L. Olson
Director, Regulatory Affairs
UPL NA Inc.

Cc: Pyxis Regulatory Consulting



4110 136TH ST CT NW
GIG HARBOR, WA 98332
T: (253) 853-7369
F: (253) 853-5516
JESSE@PYXISRC.COM

March 6, 2019

ELECTRONIC SUBMISSION

Beth Fertich (PM 4)
Document Processing Desk (**AMEND**)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

RE: UPL NA Inc., Permethrin Technical (EPA Reg. No. 70506-04)
Non-PRIA, Fast Track Label Amendment Adding Approved Uses

Dear Ms. Fertich,

On behalf of UPL NA Inc., we are submitting an application to amend the registration of Permethrin Technical (EPA Reg. No. 70506-04) to add approved food uses to the label. These uses are found on several end-use product labels (EPA Reg. Nos. 70506-05, 70506-09, 70506-66). The uses being added have established tolerances for Permethrin according to CFR §180.378 and the revised crop group listings are consistent with 40 CFR §180.41. We also wish to consolidate the labeling to list the appropriate crop groups. UPL NA Inc. wants to ensure that its technical label is as comprehensive as possible.

In support of this label amendment, we are submitting the following documents:

1. Application for Amended Pesticide Registration (EPA Form 8570-1)
2. One (1) copy of Permethrin Technical Label with changes tracked
3. One (1) copy of Permethrin Technical Label with changes incorporated
4. Certification with Respect to Citation of Data (EPA Form 8570-34)
5. Agency Internal Use Copy of the Data Matrix (EPA Form 8570-35)
6. Public File Copy of the Data Matrix (EPA Form 8570-35)
7. Letter of Authorization

UPL NA Inc. is using the cite-all method of support. As per EPA's interpretations of 40 CFR Parts 152.86(b)(2)(i) and 152.93(b)(2)(i), UPL NA Inc. submitted notices of intent to apply and offers to pay to companies on the October 1, 2018 Data Submitter's List for Permethrin. Since no data are submitted with this amendment and no data need to be reviewed to support this amendment, this action does not qualify as a PRIA action and no PRIA fee is required.

Please contact me ((253) 853-7369, Jesse@PyxisRC.com) if you have any questions or need any additional information.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jesse Lollis".

Jesse Lollis

Enclosures



United Phosphorus, Inc.

Sherry B. Hutcheson
630 Freedom Business Center, Suite 402
King of Prussia, PA 19406
Phone: (229) 247-9041

September 28, 2017

Document Processing Desk (FPL)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460-0001

Attn: Michael Wagman (Acting PM 4)

Subject: Final Printed Label for Permethrin Technical (EPA Reg. No. 70506-4)

Dear Mr. Wagman,

United Phosphorus, Inc. is submitting a final printed label for our product, Permethrin Technical (EPA Reg. No. 70506-4) in accordance with the EPA stamped label dated September 18, 2017.

In addition to this transmittal letter, we are supplying:

- an application form 8570-1,
- a final copy of the label

If you have any questions, please feel free to contact me at either 229-247-9041 or sherry.hutcheson@uniphos.com.

Best regards,

Sherry Hutcheson

Sherry B. Hutcheson
Sr. Regulatory Manager



United Phosphorus, Inc.

Sherry B. Hutcheson
630 Freedom Business Center, Suite 402
King of Prussia, PA 19406
Phone: (229) 247-9041

August 13, 2018

Document Processing Desk
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460-0001

Attn: Beth Fertich (PM 4)

Subject: Notification for Permethrin Technical (EPA Reg. No. 70506-4)

Dear Ms. Fertich,

United Phosphorus, Inc. is submitting a notification for our product, Permethrin Technical (EPA Reg. No. 70506-4). The previous CSF contained a typographical error on the reporting of the address and EPA Establishment Number. That information has been corrected and is attached here to be added to the file.

In addition to this transmittal letter, we are supplying:

- an application form 8570-1,
- Replacement Basic CSF, EPA form 8570-4
- Letter from producing establishment

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 USC Sec. 1001 to willfully make any false statements to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

If you have any questions, please feel free to contact me at either 229-247-9041 or sherry.hutcheson@uniphos.com.

Best regards,

Sherry Hutcheson
Sherry B. Hutcheson
Sr. Regulatory Manager II



Sandra Fischer
477 Madison Ave., 15th Floor
New York, NY 10022
Direct: (212) 702-5464
Fax: (212) 702-5450
sfischer@bdlaw.com

April 7, 2020

VIA FOIA ONLINE

Freedom of Information Officer
U.S. Environmental Protection Agency
Washington, D.C. 20460

RE: FOIA Request

Dear FOIA Officer:

Pursuant to the Freedom of Information Act, 5 U.S.C. § 552, as amended, and the FOIA regulations promulgated by the U.S. Environmental Protection Agency in 40 C.F.R. Part 2, I hereby request all electronic documents in EPA's files for the registrations below **since January 1, 2013**:

- 91813-13 (including documents under former registration number 70506-4)
- 91813-15 (including documents under former registration number 70506-10)
- 91813-27 (including documents under former registration number 70506-118)
- 91813-53 (including documents under former registration number 70506-18)

Due to EPA directives to work from home because of COVID-19, my understanding is FOIA Officers currently only have access to certain scanned files for each registration. Therefore, my request pertains to any files that can be currently accessed until normal EPA operations are restored.

Please contact me at (212) 702-5464 or via email if you have any questions or concerns. I authorize costs up to \$250 associated with copy and review time to prepare this request. Please let me know if the costs will exceed this amount.

Sincerely,
s/Sandra Fischer
Paralegal



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
1200 Pennsylvania Avenue, N.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collection Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the complete form to this address.

Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number UPL NA Inc. c/o Pyxis Regulatory Consulting, Inc. 4110 136 th St. Ct. NW Gig Harbor, WA 98332 (253)853-7369	EPA Registration Number/File Symbol/ 70506-04
Active Ingredient(s) and/or representative test compound(s) Permethrin	Date Mar. 06, 2019
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) TGA1	Product Name Permethrin Technical

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statements (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have including with this form a list of companies send offer of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

<input type="checkbox"/> I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	<input checked="" type="checkbox"/> I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).
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SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION


I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (I) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (II) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature 	Date Mar. 06, 2019	Typed or Printed Name and Title Jesse Lollis Regulatory Consultant
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.


WASHINGTON, D.C. 20460

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DATA MATRIX ADDRESSING GENERIC AND PRODUCT SPECIFIC REQUIREMENTS OF THE DATA CALL-IN FOR PRODUCTS CONTAINING PERMETHRIN

Date: March 6, 2019	EPA Reg No./ File Symbol: 70506-4	Page 1 of 14
Applicant's/Registrant's Name and Address: UPL NA Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406	Product: Permethrin Technical	
Ingredient: Permethrin (CAS No. 52645-53-1)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
PRODUCT SPECIFIC					
830.1550	Product identity, composition	44841201	UPI	Own	
830.1600	Description of materials Used to Produce the Product	44841201	UPI	Own	
830.1620	Production Process	44841201	UPI	Own	
830.1670	Discussion of Formation of Impurities	44841201	UPI	Own	
830.1700	Preliminary Analysis	44841201 and 50127101	UPI	Own	
830.1750	Certification of Limits	44841201	UPI	Own	
830.1800	Analytical Method	44841201	UPI	Own	
830.6302	Color	44841202	UPI	Own	
830.6303	Physical state	44841202	UPI	Own	
830.6304	Odor	44841201	UPI	Own	
830.6313	Stability	44841202	UPI	Own	
830.6314	Oxidizing/Reducing action	44841202	UPI	Own	
830.6315	Flammability	44841202	UPI	Own	
830.6316	Explosibility	44841202	UPI	Own	
830.6317	Storage Stability	48881501	UPI	Own	
830.6319	Miscibility	44841202	UPI	Own	
830.6320	Corrosion Characteristics	48881501	UPI	Own	
830.6321	Dielectric Breakdown Voltage			Not required	Product is not used around electrical equipment.
830.7000	pH	44841202	UPI	Own	
830.7050	UV/Vis	44841202	UPI	Own	

Signature 

Name and Title
Jesse Lollis Regulatory Consultant

Date
3/6/2019



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.


WASHINGTON, D.C. 20460

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DATA MATRIX ADDRESSING GENERIC AND PRODUCT SPECIFIC REQUIREMENTS OF THE DATA CALL-IN FOR PRODUCTS CONTAINING PERMETHRIN

Date: March 6, 2019	EPA Reg No./ File Symbol: 70506-4	Page 2 of 14
Applicant's/Registrant's Name and Address: UPL NA Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406	Product: Permethrin Technical	
Ingredient: Permethrin (CAS No. 52645-53-1)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7100	Viscosity	44841202	UPI	Own	
830.7200	Melting Point			Not Required	Product is a liquid.
830.7220	Boiling Point/Range	44841202	UPI	Own	
830.7300	Density, bulk density, specific gravity	44841202	UPI	Own	
830.7370	Dissociation Constant in water			Not required	No significant acidic or basic moieties
830.7550/7570	Octanol/water Partition coefficient	44841202	UPI	Own	
830.7840/7860	Water Solubility	44841202	UPI	Own	
830.7950	Vapor Pressure	44841202	UPI	Own	
870.1100	Acute oral toxicity	242899	FMC	Own	
870.1200	Acute dermal toxicity – rat	242899	FMC	Own	
870.1300	Acute inhalation toxicity – rat	41031103	Amvac	OLD	
870.2400	Eye irritation	242899	FMC	Own	
870.2500	Skin irritation	242899	FMC	Own	
870.2600	Skin sensitization			Not required	RED does not require

Signature 

Name and Title
Jesse Lollis Regulatory Consultant

Date
3/6/2019



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WASHINGTON, D.C. 20460

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DATA MATRIX ADDRESSING GENERIC AND PRODUCT SPECIFIC REQUIREMENTS OF THE DATA CALL-IN FOR PRODUCTS CONTAINING PERMETHRIN

Date: March 6, 2019	EPA Reg No./ File Symbol: 70506-4	Page 3 of 14
Applicant's/Registrant's Name and Address: UPL NA Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406	Product: Permethrin Technical	
Ingredient: Permethrin (CAS No. 52645-53-1)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
GENERIC DATA REQUIREMENTS					
UPL NA Inc. is using the cite-all option to satisfy Permethrin generic data requirements. UPL NA Inc. has made offers-to-pay to the following companies on the October 1, 2018 Data Submitters List for Permethrin.					
		Cite-All	Bonide Products, Inc.	PAY	
		Cite-All	Coopers Animal Health, Inc.	PAY	
		Cite-All	L. Perrigo Company	PAY	
		Cite-All	Syngenta Crop Protection, LLC.	PAY	
		Cite-All	Senoret Chemical Co., Inc.	PAY	
		Cite-All	Value Gardens Supply, LLC.	PAY	
		Cite-All	The Scotts Company	PAY	
		Cite-All	Bayer Cropscience LP	PAY	
		Cite-All	Farnam Companies, Inc.	PAY	
		Cite-All	FMC Corporation	PAY	
		Cite-All	United Industries Corporation	PAY	
		Cite-All	E.I. Du Pont De Nemours and Company	PAY	
		Cite-All	Nott Products Co., Inc.	PAY	
		Cite-All	MacDermid Agricultural Solutions, Inc.	PAY	

Signature 

Name and Title
Jesse Lollis Regulatory Consultant

Date
3/6/2019



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.


WASHINGTON, D.C. 20460

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DATA MATRIX ADDRESSING GENERIC AND PRODUCT SPECIFIC REQUIREMENTS OF THE DATA CALL-IN FOR PRODUCTS CONTAINING PERMETHRIN

Date: March 6, 2019	EPA Reg No./ File Symbol: 70506-4	Page 4 of 14
Applicant's/Registrant's Name and Address: UPL NA Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406	Product: Permethrin Technical	
Ingredient: Permethrin (CAS No. 52645-53-1)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
		Cite-All	Bayer Environmental Science	PAY	
		Cite-All	Realex	PAY	
		Cite-All	Chase Products Company	PAY	
		Cite-All	BASF Corporation	PAY	
		Cite-All	Univar USA, Inc.	PAY	
		Cite-All	Value Garden Supply, LLC.	PAY	
		Cite-All	Prentiss, LLC.	PAY	
		Cite-All	Claire Manufacturing Company	PAY	
		Cite-All	Intervet, Inc.	PAY	
		Cite-All	Southern Agricultural Insecticides, Inc.	PAY	
		Cite-All	Green Light Company	PAY	
		Cite-All	Lebanon Seaboard Corporation	PAY	
		Cite-All	Zoetis Inc.	PAY	
		Cite-All	McLaughlin Gormley King Company	PAY	
		Cite-All	IBC Manufacturing Company	PAY	
		Cite-All	Fuller System, Inc.	PAY	
		Cite-All	Winfield Solutions, LLC.	PAY	
		Cite-All	W.F. Young, Inc.	PAY	

Signature 

Name and Title
Jesse Lollis Regulatory Consultant

Date
3/6/2019



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WASHINGTON, D.C. 20460

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DATA MATRIX ADDRESSING GENERIC AND PRODUCT SPECIFIC REQUIREMENTS OF THE DATA CALL-IN FOR PRODUCTS CONTAINING PERMETHRIN

Date: March 6, 2019	EPA Reg No./ File Symbol: 70506-4	Page 5 of 14
Applicant's/Registrant's Name and Address: UPL NA Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406	Product: Permethrin Technical	
Ingredient: Permethrin (CAS No. 52645-53-1)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
		Cite-All	NCH Corporation	PAY	
		Cite-All	PBI/Gordon Corporation	PAY	
		Cite-All	Virbac AH, Inc.	PAY	
		Cite-All	Sergeant's Pet Care Products, Inc.	PAY	
		Cite-All	The Hartz Mountain Corporation	PAY	
		Cite-All	Wellmark International	PAY	
		Cite-All	Happy Jack, Inc.	PAY	
		Cite-All	Miller W C Chem Company	PAY	
		Cite-All	Wilbur-Ellis Company, LLC	PAY	
		Cite-All	Lynwood Labs, Inc.	PAY	
		Cite-All	ABC Compounding Co., Inc.	PAY	
		Cite-All	Pet Chemicals	PAY	
		Cite-All	Cheminova A/S	PAY	
		Cite-All	S.C. Johnson & Son, Inc.	PAY	
		Cite-All	AMVAC Chemical Corporation	PAY	
		Cite-All	Air Guard Control	PAY	
		Cite-All	Summit Chemical Company	PAY	
		Cite-All	Cessco, Inc.	PAY	
		Cite-All	IQ Products Company	PAY	

Signature 	Name and Title Jesse Lollis Regulatory Consultant	Date 3/6/2019
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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WASHINGTON, D.C. 20460

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DATA MATRIX ADDRESSING GENERIC AND PRODUCT SPECIFIC REQUIREMENTS OF THE DATA CALL-IN FOR PRODUCTS CONTAINING PERMETHRIN

Date: March 6, 2019	EPA Reg No./ File Symbol: 70506-4	Page 6 of 14
Applicant's/Registrant's Name and Address: UPL NA Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406	Product: Permethrin Technical	
Ingredient: Permethrin (CAS No. 52645-53-1)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
		Cite-All	Voluntary Purchasing Groups, Inc.	PAY	
		Cite-All	J.J. Mauget Company	PAY	
		Cite-All	Clarke Mosquito Control Products, Inc.	PAY	
		Cite-All	United Industries Corporation	PAY	
		Cite-All	Safeguard Chemical Corporation	PAY	
		Cite-All	Sunniland Corporation	PAY	
		Cite-All	Amrep, Inc.	PAY	
		Cite-All	N.C.P. of NW Ohio	PAY	
		Cite-All	Chemsico	PAY	
		Cite-All	Fiebing Company, Inc.	PAY	
		Cite-All	Syngenta Crop Protection	PAY	
		Cite-All	Sumitomo Chemical Company, Ltd.	PAY	
		Cite-All	Contact Industries	PAY	
		Cite-All	AMREP, Inc.	PAY	
		Cite-All	Sherwin Williams Diversified Brands	PAY	
		Cite-All	Sungro Chemicals, Inc.	PAY	
		Cite-All	Bayer Healthcare, LLC.	PAY	
		Cite-All	ADAMA Agan Ltd.	PAY	

Signature 

Name and Title
Jesse Lollis Regulatory Consultant

Date
3/6/2019



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401 M Street, S.W.


WASHINGTON, D.C. 20460

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DATA MATRIX ADDRESSING GENERIC AND PRODUCT SPECIFIC REQUIREMENTS OF THE DATA CALL-IN FOR PRODUCTS CONTAINING PERMETHRIN

Date: March 6, 2019	EPA Reg No./ File Symbol: 70506-4	Page 7 of 14
Applicant's/Registrant's Name and Address: UPL NA Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406	Product: Permethrin Technical	
Ingredient: Permethrin (CAS No. 52645-53-1)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
		Cite-All	Plaze Georgia	PAY	
		Cite-All	ADAMA Makhteshim Ltd.	PAY	
		Cite-All	Speer Products, Inc.	PAY	
		Cite-All	Gil MFG, Inc.	PAY	
		Cite-All	Rainbow Technology Corporation	PAY	
		Cite-All	I2LResearch USA, Inc.	PAY	
		Cite-All	Bio-Derm Laboratories, Inc.	PAY	
		Cite-All	Sandoz Agro, Inc.	PAY	
		Cite-All	Pyranha, Inc.	PAY	
		Cite-All	Phaeton Corporation	PAY	
		Cite-All	Mitsui Chemicals, Inc.	PAY	
		Cite-All	Gharda Chemicals, Ltd.	PAY	
		Cite-All	H Wilson Manufacturing Co. Inc.	PAY	
		Cite-All	WeChem, Inc.	PAY	
		Cite-All	Loveland Products, Inc.	PAY	
		Cite-All	Aerochem, Inc.	PAY	
		Cite-All	Y-TEX Corporation	PAY	
		Cite-All	Octavius Hunt, Ltd.	PAY	
		Cite-All	Lawson Products, Inc.	PAY	
		Cite-All	Zep Commercial Sales & Service	PAY	
		Cite-All	Safer, Inc.	PAY	

Signature 

Name and Title
Jesse Lollis Regulatory Consultant

Date
3/6/2019



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DATA MATRIX ADDRESSING GENERIC AND PRODUCT SPECIFIC REQUIREMENTS OF THE DATA CALL-IN FOR PRODUCTS CONTAINING PERMETHRIN

Date: March 6, 2019	EPA Reg No./ File Symbol: 70506-4	Page 8 of 14
Applicant's/Registrant's Name and Address: UPL NA Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406	Product: Permethrin Technical	
Ingredient: Permethrin (CAS No. 52645-53-1)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
		Cite-All	Albaugh, Inc.	PAY	
		Cite-All	Weeks & Leo Co., Inc.	PAY	
		Cite-All	QuestSpecialty Corporation	PAY	
		Cite-All	CTX-Cenol, Inc.	PAY	
		Cite-All	Insecta Marketing, Inc.	PAY	
		Cite-All	Burlington Scientific Corporation	PAY	
		Cite-All	Celex, Division of United Industries Corp.	PAY	
		Cite-All	K-G Spray-Pak, Inc.	PAY	
		Cite-All	Chem-Tech, Ltd.	PAY	
		Cite-All	Palm Beach Laboratories, Inc.	PAY	
		Cite-All	Coulston Products, Inc.	PAY	
		Cite-All	BASF Sparks, LLC.	PAY	
		Cite-All	LHB Industries	PAY	
		Cite-All	BASF Corporation	PAY	
		Cite-All	The Fountainhead Group, Inc.	PAY	
		Cite-All	Control Solutions, Inc.	PAY	
		Cite-All	Virbac	PAY	
		Cite-All	Arizona Chemical Group, Inc.	PAY	
		Cite-All	CRC Industries, Inc.	PAY	

Signature 

Name and Title
Jesse Lollis Regulatory Consultant

Date
3/6/2019



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DATA MATRIX ADDRESSING GENERIC AND PRODUCT SPECIFIC REQUIREMENTS OF THE DATA CALL-IN FOR PRODUCTS CONTAINING PERMETHRIN

Date: March 6, 2019	EPA Reg No./ File Symbol: 70506-4	Page 9 of 14
Applicant's/Registrant's Name and Address: UPL NA Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406	Product: Permethrin Technical	
Ingredient: Permethrin (CAS No. 52645-53-1)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
		Cite-All	Ecohealth, Inc.	PAY	
		Cite-All	CAR-MAC Products, Inc.	PAY	
		Cite-All	Gro Tec, Inc.	PAY	
		Cite-All	Valent U.S.A. LLC	PAY	
		Cite-All	Lineguard, Inc.	PAY	
		Cite-All	Becker Microbial Products, Inc.	PAY	
		Cite-All	Management Contract Services, Inc.	PAY	
		Cite-All	Nisus Corporation	PAY	
		Cite-All	Pyrethroid Working Group	PAY	
		Cite-All	Merial, Inc.	PAY	
		Cite-All	Arysta Lifescience North America, LLC	PAY	
		Cite-All	SDTF	OWN	
		Cite-All	Fly Guard Systems, Inc.	PAY	
		Cite-All	Ecto Development Corporation	PAY	
		Cite-All	PM Resources, Inc.	PAY	
		Cite-All	Sherwin-Williams Diversified Brands	PAY	
		Cite-All	Synergy Labs	PAY	
		Cite-All	Bengal Products, Inc.	PAY	
		Cite-All	Pet Logic, LLC	PAY	

Signature 

Name and Title
Jesse Lollis Regulatory Consultant

Date
3/6/2019



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DATA MATRIX ADDRESSING GENERIC AND PRODUCT SPECIFIC REQUIREMENTS OF THE DATA CALL-IN FOR PRODUCTS CONTAINING PERMETHRIN

Date: March 6, 2019	EPA Reg No./ File Symbol: 70506-4	Page 10 of 14
Applicant's/Registrant's Name and Address: UPL NA Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406	Product: Permethrin Technical	
Ingredient: Permethrin (CAS No. 52645-53-1)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
		Cite-All	Babolna Bioenvironmental Centre, Ltd.	PAY	
		Cite-All	Meghmani Organics, Ltd.	PAY	
		Cite-All	Gharda USA, Inc.	PAY	
		Cite-All	Premium Environmental Products, LLC.	PAY	
		Cite-All	LG Chem, Ltd.	PAY	
		Cite-All	RIAP Chemcial Factory	PAY	
		Cite-All	Outdoor Residential Exposure Task Force	OWN	
		Cite-All	Agricultural Reentry Task Force	OWN	
		Cite-All	Thermacell Repellants, Inc.	PAY	
		Cite-All	Bayer Advanced	PAY	
		Cite-All	Plexus Services, Inc.	PAY	
		Cite-All	Manna Pro Products, LLC	PAY	
		Cite-All	Valent Biosciences LLC	PAY	
		Cite-All	Dairy Solutions, Inc.	PAY	
		Cite-All	Sapstain Industry Group (SIG)	PAY	
		Cite-All	Non-Dietary Exposure Task Force	PAY	
		Cite-All	A.N.T.S. Research & Development Corp.	PAY	

Signature 

Name and Title
Jesse Lollis Regulatory Consultant

Date
3/6/2019



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DATA MATRIX ADDRESSING GENERIC AND PRODUCT SPECIFIC REQUIREMENTS OF THE DATA CALL-IN FOR PRODUCTS CONTAINING PERMETHRIN

Date: March 6, 2019	EPA Reg No./ File Symbol: 70506-4	Page 11 of 14
Applicant's/Registrant's Name and Address: UPL NA Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406	Product: Permethrin Technical	
Ingredient: Permethrin (CAS No. 52645-53-1)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
		Cite-All	IDC Company	PAY	
		Cite-All	Pro Products	PAY	
		Cite-All	Nix, Inc.	PAY	
		Cite-All	Univar Environmental Services	PAY	
		Cite-All	Tagros Chemicals India Private, Ltd.	PAY	
		Cite-All	Travel Medicine	PAY	
		Cite-All	FIFRA Endangered Species Task Force, LLC	PAY	
		Cite-All	Koppers Performance Chemicals New Zealand	PAY	
		Cite-All	Bug Stomper II, LLC.	PAY	
		Cite-All	Product & Regulatory Associates, LLC.	PAY	
		Cite-All	Bio-Planet Products	PAY	
		Cite-All	Insect Shield, LLC.	PAY	
		Cite-All	Residential Exposure Joint Venture	OWN	
		Cite-All	Regguide	PAY	
		Cite-All	Arch Wood Protection (NZ), Ltd.	PAY	
		Cite-All	Notable Solutions, LLC	PAY	

Signature 	Name and Title Jesse Lollis Regulatory Consultant	Date 3/6/2019
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DATA MATRIX ADDRESSING GENERIC AND PRODUCT SPECIFIC REQUIREMENTS OF THE DATA CALL-IN FOR PRODUCTS CONTAINING PERMETHRIN

Date: March 6, 2019	EPA Reg No./ File Symbol: 70506-4	Page 12 of 14
Applicant's/Registrant's Name and Address: UPL NA Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406	Product: Permethrin Technical	
Ingredient: Permethrin (CAS No. 52645-53-1)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
		Cite-All	Agricultural Handler Exposure Task Force	OWN	
		Cite-All	Manna Pro Products, LLC	PAY	
		Cite-All	Nova Biogenetics, Inc.	PAY	
		Cite-All	Andrew M Martin Co., NV, Inc.	PAY	
		Cite-All	Starensier, Inc.	PAY	
		Cite-All	Bikel International, Inc.	PAY	
		Cite-All	Traveler's Supply, Inc.	PAY	
		Cite-All	Eastern Chemical, LLC	PAY	
		Cite-All	Allergy Technologies, LLC	PAY	
		Cite-All	Pinebelt Processing, Inc.	PAY	
		Cite-All	HOMS, LLC	PAY	
		Cite-All	Garnik Industries, LLC	PAY	
		Cite-All	Winfiled Solutions, LLC	PAY	
		Cite-All	CEVA Animal Health, LLC	PAY	
		Cite-All	International Textile Group, Inc.	PAY	
		Cite-All	AgSaver, LLC	PAY	
		Cite-All	Callington Haven Party, Ltd.	PAY	
		Cite-All	GAT Microencapsulation GMBH	PAY	
		Cite-All	Generic Endangered Species Task Force	OWN	

Signature 

Name and Title
Jesse Lollis Regulatory Consultant

Date
3/6/2019



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DATA MATRIX ADDRESSING GENERIC AND PRODUCT SPECIFIC REQUIREMENTS OF THE DATA CALL-IN FOR PRODUCTS CONTAINING PERMETHRIN

Date: March 6, 2019	EPA Reg No./ File Symbol: 70506-4	Page 13 of 14
Applicant's/Registrant's Name and Address: UPL NA Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406	Product: Permethrin Technical	
Ingredient: Permethrin (CAS No. 52645-53-1)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
		Cite-All	Gharda Generics, Inc.	PAY	
		Cite-All	CSPA/Permethrin Dermal Absorption Group	PAY	
		Cite-All	Alpha Scents, Inc.	PAY	
		Cite-All	Fulcra Chemicals, LLC	PAY	
		Cite-All	Precision Control Technology, Inc.	PAY	
		Cite-All	Permethrin Data Group II Steering Comm.	PAY	
		Cite-All	GHI Manufacturing, Inc.	PAY	
		Cite-All	Envincio, LLC	PAY	
		Cite-All	U.S. Animal Health	PAY	
		Cite-All	Triton Systems, Inc.	PAY	
		Cite-All	Cenral Garden & Pet Company	PAY	
		Cite-All	TruRx. LLC	PAY	
		Cite-All	H.L.E. Solutions	PAY	
		Cite-All	Council for the Advancement of Pyrethroid Risk Assessment	PAY	
		Cite-All	OTC Chemical, LLC.	PAY	
		Cite-All	CAP IM Supply, Inc.	PAY	
		Cite-All	Florida Insect Control Group LLC	PAY	

Signature 

Name and Title
Jesse Lollis Regulatory Consultant

Date
3/6/2019



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DATA MATRIX ADDRESSING GENERIC AND PRODUCT SPECIFIC REQUIREMENTS OF THE DATA CALL-IN FOR PRODUCTS CONTAINING PERMETHRIN

Date: March 6, 2019	EPA Reg No./ File Symbol: 70506-4	Page 14 of 14
Applicant's/Registrant's Name and Address: UPL NA Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406	Product: Permethrin Technical	
Ingredient: Permethrin (CAS No. 52645-53-1)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
		Cite-All	Evergreen Animal Health	PAY	
		Cite-All	Tevra Brands, LLC	PAY	
		Cite-All	Greenfield Envirosiences, Inc.	PAY	
		Cite-All	HHL Group Limited	PAY	

Signature

Name and Title
Jesse Lollis Regulatory ConsultantDate
3/6/2019

 <div style="text-align: center;"> Environmental Protection Agency United States Washington, DC 20460 </div>	<input type="checkbox"/> Registration <input checked="" type="checkbox"/> Amendment <input type="checkbox"/> Other	OPP Identifier Number
---	---	-----------------------

Application for Pesticide – Section I

1. Company/Product Number UPL Delaware, Inc. / 91813-13	2. EPA Product Manager B. Fertich	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) UPL Delaware, Inc./ Permethrin Technical	PM# 4	
5. Name and Address of Applicant (include ZIP Code) UPL Delaware, Inc. c/o Pyxis Regulatory Consulting Inc. 4110 136 th St. Ct. NW Gig Harbor, WA 98332		6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____

Section - II

<input checked="" type="checkbox"/> Amendment – Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input type="checkbox"/> Notification – Explain below.	<input type="checkbox"/> Final printed labels in response to _____ Agency letter dated _____ <input type="checkbox"/> “Me Too” Application. <input type="checkbox"/> Other – Explain below.
---	--


Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

PRIA Category R352 (65). Label amendment adding approved uses; selective-cite. The fee due is \$13,888.00 and has been paid. A receipt of PRIA pre-payment from pay.gov is included with this application. Please contact me (Nicole@PyxisRC.com, (253)853-7369) if you have any questions or need any additional information.

Section - III

1. Material This Product Will Be Packaged In:					
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
* Certification must be submitted		If “Yes” Unit Packaging wgt. _____	No. per container _____	If “Yes” Package wgt. _____	No. per container _____
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container _____		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Other _____ <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled					

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Nicole O'Loughlin	Title Senior Regulatory Consultant	Telephone No. (Include Area Code) (253) 853-7369	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received <div style="text-align: center; border: 1px solid black; padding: 5px;"> (Stamped) </div>
2. Signature 	3. Title Senior Regulatory Consultant		
4. Typed Name Nicole O'Loughlin	5. Date Oct. 03, 2019		



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1200 Pennsylvania Avenue, N.W.
WASHINGTON, D.C. 20460

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Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number UPL Delaware, Inc. c/o Pyxis Regulatory Consulting, Inc. 4110 136 th St. Ct. NW Gig Harbor, WA 98332 (253)853-7369	EPA Registration Number/File Symbol/ 91813-13
Active Ingredient(s) and/or representative test compound(s) Permethrin	Date Oct. 03, 2019
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) TGA1	Product Name Permethrin Technical

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statements (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have including with this form a list of companies send offer of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

<input type="checkbox"/> I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	<input checked="" type="checkbox"/> I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).
--	---

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☐ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (I) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (II) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature 	Date Oct. 03, 2019	Typed or Printed Name and Title Nicole O'Loughlin Senior Regulatory Consultant
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DATA MATRIX

Date October 3, 2019	EPA Reg No./File Symbol 91813-13	Page 1 of 29
Applicant's/Registrant's Name & Address UPL NA Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406	Product Permethrin Technical	
Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
PRODUCT SPECIFIC DATA REQUIREMENTS					
830.1550	Product Identity and Composition	44841201	UPL NA Inc.	OWN	
830.1600	Description of Materials Used to Produce the Product	44841201	UPL NA Inc.	OWN	
830.1620	Description of the Production Process	44841201	UPL NA Inc.	OWN	
830.1650	Description of the Formulation Process				Not required ¹
830.1670	Discussion of Formation of Impurities	44841201	UPL NA Inc.	OWN	
830.1700	Preliminary Analysis	44841201	UPL NA Inc.	OWN	
		50127101	UPL NA Inc.	OWN	
830.1750	Certified Limits	44841201	UPL NA Inc.	OWN	
830.1800	Enforcement Analytical Method	44841201	UPL NA Inc.	OWN	
830.6302	Color	44841202	UPL NA Inc.	OWN	
830.6303	Physical State	44841202	UPL NA Inc.	OWN	
830.6304	Odor	44841201	UPL NA Inc.	OWN	
830.6313	Stability to Normal and Elevated Temperatures, Metals and Metal Ions	44841202	UPL NA Inc.	OWN	
830.6314	Oxidation / Reduction: Chemical Incompatibility	44841202	UPL NA Inc.	OWN	
830.6315	Flammability	44841202	UPL NA Inc.	OWN	
830.6316	Explosibility	44841202	UPL NA Inc.	OWN	
830.6317	Storage Stability	48881501	UPL NA Inc.	OWN	
830.6319	Miscibility	44841202	UPL NA Inc.	OWN	
830.6320	Corrosion Characteristics	48881501	UPL NA Inc.	OWN	
830.6321	Dielectric Breakdown Voltage				Not required ²

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Applicant's/Registrant's Name & Address UPL NA Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406	Product Permethrin Technical	

Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7000	pH	44841202	UPL NA Inc.	OWN	
830.7050	UV / Visible Absorption	44841202	UPL NA Inc.	OWN	
830.7100	Viscosity	44841202	UPL NA Inc.	OWN	
830.7200	Melting Point / Melting Range				Not required ³
830.7220	Boiling Point / Boiling Range	44841202	UPL NA Inc.	OWN	
830.7300	Density / Relative Density / Bulk Density	44841202	UPL NA Inc.	OWN	
830.7370	Dissociation Constants in Water				Not required ⁴
830.7520	Particle Size, Fiber Length, and Diameter Distribution				Not required
830.7550	Partition Coefficient (n-octanol/water), Shake Flask Method	44841202	UPL NA Inc.	OWN	
830.7560	Partition Coefficient (n-octanol/water), Generator Method				See 830.7550
830.7570	Partition Coefficient (n-octanol/water), Estimation by Liquid Chromatography				See 830.7550
830.7840	Water Solubility: Column Elution Method, Shake Flask Method	44841202	UPL NA Inc.	OWN	
830.7860	Water Solubility: Generator Column Method				See 830.7840
830.7950	Vapor Pressure	44841202	UPL NA Inc.	OWN	
870.1100	Acute Oral Toxicity – rat	00242899		OLD	See endnote ⁵
870.1200	Acute Dermal Toxicity – rat	00242899		OLD	See endnote ⁶
870.1300	Acute Inhalation Toxicity – rat	41031103		OLD	
870.2400	Eye Irritation	00242899		OLD	See endnote ⁷
870.2500	Skin Irritation	00242899		OLD	See endnote ⁸
870.2600	Skin Sensitization				Not required ⁹

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Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
PERMETHRIN GENERIC DATA REQUIREMENTS					
850.2100	Acute Avian Oral Toxicity	41888401 49511902	Permethrin Data Group II Steering Committee/Joint Venture (PDGII)	OLD OWN	See endnote ¹⁰
850.2200	Acute Avian Dietary Toxicity	41888402 41888403		OLD OLD	See endnote ¹¹
850.2400	Wild Mammal Toxicity				Not required / See 870 series
850.2300	Avian Reproductive Toxicity	42322901 42322902		OLD OLD	See endnote ¹²
850.2500	Simulated or Actual Field Testing				Not required
850.1075	Freshwater Fish Toxicity	00110663 00110657 49540301	PDGII	OLD OLD OWN	See endnote ¹³
850.1010	Freshwater Invertebrate Toxicity	00110662 00110663		OLD OLD	See endnote ¹⁴
850.1025, 850.1035, 850.1045, 850.1055, 850.1075	Acute Toxicity Estuarine and Marine Organisms	41874901 42584001 43492902 49511901	PDG II	OLD OLD OLD OWN	See endnote ¹⁵
850.1300	Aquatic Invertebrate Life Cycle (Freshwater)	43745701		OLD	See endnote ¹⁶
850.1350	Aquatic Invertebrate Life Cycle (Saltwater)	49554601	PDG II	OWN	See endnote ¹⁷

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Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
850.1400	Fish Early Life Stage (Freshwater)	00110666		OLD	See endnote ¹⁸
850.1400	Fish Early Life Stage (Saltwater)				Not required ¹⁹
850.1500	Life Cycle Fish	00161436		OLD	See endnote ²⁰
850.1710, 850.1730, 850.1850	Aquatic Organisms Bioavailability, Biomagnification, Toxicity	41300401 41300402 41300403		OLD OLD OLD	See endnote ²¹
850.1950	Simulated or Actual Field Testing for Aquatic Organisms				Not required
850.1735	Whole Sediment: Acute Freshwater Invertebrates				Not required
850.1740	Whole Sediment: Acute Marine Invertebrates				Not required
N/A	Whole Sediment: Chronic Invertebrates Freshwater and Marine	48788101 48788301 49063101	PDGII PDGII PDGII	OWN OWN OWN	See endnote ²²
850.3020	Honey Bee Acute Contact Toxicity	42674501		OLD	See endnote ²³
850.3030	Honeybee Toxicity of Residues on Foliage	42009301		OLD	See endnote ²⁴
850.3040	Field Testing for Pollinators				Reserved ²⁵
SS-1149	Aquatic Invertebrate Acute Toxicity	49513901	PDGII	OWN	
870.6100	Delayed Neurotoxicity (Acute) – Hen				Not required
870.6200	Acute Neurotoxicity – Rat	43046301 45657401		OLD OLD	See endnote ²⁶

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Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.3100	90-Day Oral: Rodent	00025914 00025915 00040491 00054737 00070577		OLD OLD OLD OLD OLD	See endnote ²⁷
870.3150	90-Day Oral: Non-Rodent	00029832 00043722 00070576 00071951		OLD OLD OLD OLD	See endnote ²⁸
870.3200	21/28-Day Dermal Toxicity	41143801 42653301		OLD OLD	See endnote ²⁹
870.3250	90-Day Dermal Toxicity				Not required ³⁰
870.3465	90-Day Inhalation Toxicity	00096713		OLD	See endnote ³¹
870.6100	28-Day Delayed Neurotoxicity – Hen				Not required
870.6200	90-Day Neurotoxicity	00071952 40766807		OLD OLD	See endnote ³²
870.4100	Chronic Oral Rodent	00069701 00120268		OLD OLD	See endnote ³³

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Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.4200	Carcinogenicity	00069701 00069703 00069704 00102110 00120268 45597105		OLD OLD OLD OLD OLD OLD	See endnote ³⁴
870.3700	Reproduction / Developmental Toxicity Screening Test	40943602 40943603		OLD OLD	See endnote ³⁵
870.3800	2-Generation Reproduction: Rat	00102108 00120271		OLD OLD	See endnote ³⁶
870.6300	Developmental Neurotoxicity Study				Not required ³⁷
870.5100	Bacterial Reverse Mutation Test	41031107		OLD	See endnote ³⁸
870.5300, 870.5375	<i>In vitro</i> Mammalian Cell Assay				Not required
870.5385, 870.5395, 870.5450, 870.5550	<i>In vivo</i> Cytogenetics and Other Effects	40943604 42723302		OLD OLD	See endnote ³⁹
870.7485	Metabolism and Pharmacokinetics	00054719 00054720 00065903 00089006 00102185		OLD OLD OLD OLD OLD	See endnote ⁴⁰
870.7200	Companion Animal Safety				Not required / Formulation specific

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Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.7600	Dermal Penetration	43169001		OLD	See endnote ⁴¹
870.7800	Immunotoxicity				Not required ⁴²
875.1100	Dermal Exposure – Outdoor		Agricultural Handler Exposure TF	OWN	See endnote ⁴³
875.1200	Dermal Exposure – Indoor		Agricultural Handler Exposure TF	OWN	See endnote ⁴³
875.1300	Inhalation Exposure – Outdoor		Agricultural Handler Exposure TF	OWN	See endnote ⁴³
875.1400	Inhalation Exposure – Indoor		Agricultural Handler Exposure TF	OWN	See endnote ⁴³
875.1500	Biological Monitoring		Agricultural Handler Exposure TF	OWN	See endnote ⁴³
875.1600	Data Reporting and Calculations		Agricultural Handler Exposure TF	OWN	See endnote ⁴³
875.1700	Product Use Information		Agricultural Handler Exposure TF	OWN	See endnote ⁴³
875.2100	Dislodgeable Foliar Residue and Turf Transferable Residues	43755701 44955501		OLD OLD	
875.2200	Soil Residue Dissipation		Agricultural Reentry TF Outdoor Residential Exposure TF	OWN OWN	See endnote ⁴⁴
875.2400	Dermal Exposure		Agricultural Reentry TF Outdoor Residential Exposure TF	OWN OWN	See endnote ⁴⁴
875.2500	Inhalation Exposure		Agricultural Reentry TF Outdoor Residential Exposure TF	OWN OWN	See endnote ⁴⁴
875.2600	Biological Monitoring		Agricultural Reentry TF Outdoor Residential Exposure TF	OWN OWN	See endnote ⁴⁴

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Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
875.2700	Product Use Information		Agricultural Reentry TF Outdoor Residential Exposure TF	OWN OWN	See endnote ⁴⁴
875.2800	Descriptions of Human Activity		Agricultural Reentry TF Outdoor Residential Exposure TF	OWN OWN	See endnote ⁴⁴
875.2900	Data Reporting and Calculations		Agricultural Reentry TF Outdoor Residential Exposure TF	OWN OWN	See endnote ⁴⁴
875.3000	Nondietary Ingestion Exposure		Agricultural Reentry TF Outdoor Residential Exposure TF	OWN OWN	See endnote ⁴⁴
201-1	Droplet Size Spectrum		Spray Drift TF	OWN	See endnote ⁴⁵
202-1	Droplet Size Spectrum		Spray Drift TF	OWN	See endnote ⁴⁵
890.1100	Amphibian Metamorphosis (Rat)	48988601	PDGII	OWN	See endnote ⁴⁶
890.1150	Androgen Receptor Binding (Rat Prostate)				Not applicable / See endnote ⁴⁷
890.1200	Aromatase (Human Recombinant)	48618601	PDGII	OWN	See endnote ⁴⁸
890.1250	Estrogen Receptor Binding				Not applicable / See endnote ⁴⁷
890.1300	Estrogen Receptor Transcriptional Activation Assay				Not applicable / See endnote ⁴⁷
890.1350	Fish Short-Term Reproduction	48702301	PDGII	OWN	See endnote ⁴⁹
890.1400	Hershberger (Rat)	48618602	PDGII	OWN	See endnote ⁵⁰
890.1450	Female Pubertal (Rat)	48672901	PDGII	OWN	See endnote ⁵¹

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Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
890.1500	Male Pubertal (Rat)	48687101	PDGII	OWN	See endnote ⁵²
890.1550	Steroidogenesis	48618603	PDGII	OWN	See endnote ⁵³
890.1600	Uterotrophic (Rat)				Not applicable / See endnote ⁴⁷
850.4100	Tier 1: Seedling Emergence	49475301	PDGII	OWN	See endnote ⁵⁴
850.4150	Tier 1: Vegetative Vigor	49475302	PDGII	OWN	See endnote ⁵⁵
850.4400, 850.4500	Tier 1: Aquatic Plant Growth	49398801 49398803 49398804 49398805	PDGII PDGII PDGII PDGII	OWN OWN OWN OWN	See endnote ⁵⁶
850.4100	Tier 2: Seedling Emergence	49475301	PDGII	OWN	See endnote ⁵⁴
850.4150	Tier 2: Vegetative Vigor	49475302	PDGII	OWN	See endnote ⁵⁵
850.4400, 850.4500	Tier 2: Aquatic Plant Growth	49398801 49398803 49398804 49398805	PDGII PDGII PDGII PDGII	OWN OWN OWN OWN	See endnote ⁵⁶
850.4300	Terrestrial Field				Not required
850.4450	Aquatic Field				Not required
850.4025	Target Area Phytotoxicity				Not required
850.4550	Cyanobacteria Toxicity	49398802	PDGII	OWN	See endnote ⁵⁷
835.2120	Hydrolysis	00102043			See endnote ⁵⁸

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Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
835.2240	Photodegradation in Water	40242801 49542801	PDGII	OLD OWN	See endnote ⁵⁹
835.2410	Photodegradation in Soil	40190101		OLD	See endnote ⁶⁰
835.2370	Photodegradation in Air				Not required
835.4100	Aerobic Soil Metabolism	42410002 49622001	PDGII	OLD OWN	See endnote ⁶¹
835.4200	Anaerobic Soil Metabolism	41970601 49728101	PDGII	OLD OWN	See endnote ⁶²
835.4300	Aerobic Aquatic Metabolism	43938201 49624902	PDGII	OLD OWN	See endnote ⁶³
835.4400	Anaerobic Aquatic Metabolism	43982001 49624903	PDGII	OLD OWN	See endnote ⁶⁴
835.1230	Leaching / Adsorption / Desorption	41868001 43424901 45170102 49624901	PDGII	OLD OLD OLD OWN	See endnote ⁶⁵
835.1410	Volatility – Laboratory				Not required
835.8100	Volatility – Field				Not required
835.6100	Soil Field Dissipation Study	42359101		OLD	
835.6200	Aquatic Sediment Field Dissipation Study	44030501 44157101		OLD OLD	
835.6300	Forest Field Dissipation Study				Not required

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Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
835.6400	Combination and Tank Mixes				Not required
835.7100	Ground Water Monitoring				Not required
850.6100	Environmental Chemistry Methods	49263701 49421001	PDGII PDGII	OWN OWN	
SS-1099	Leachability from Treated Wood	49638201 49638202	PDGII PDGII	OWN OWN	
SS-1065	POTW Treatability Study	48762906	Pyrethroid Working Group	PER	
860.1300	Nature of the Residue: Plants	00025919 00025920 00094393 00094394 43307801		OLD OLD OLD OLD OLD	
860.1300	Nature of the Residue: Livestock	42196702-03 42410001 42503201 43458801-02 43505201 43713301-04 43962801 44196101-02 44417803		OLD OLD OLD OLD OLD OLD OLD OLD OLD	
860.1850	Confined Rotational Crops	43174401		OLD	

Signature

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Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1340	Residue Analytical Methods	00043877		OLD	
		00054724		OLD	
		00064675		OLD	
		00064678		OLD	
		00070916		OLD	
		00072582		OLD	
		00160394		OLD	
		40404002		OLD	
		40446403-04		OLD	
		40556804		OLD	
		41641001		OLD	
		42137202		OLD	
		43364705		OLD	
		43962801		OLD	
		44196103		OLD	
		44417801-02		OLD	
		44428204		OLD	
860.1360	Multiresidue Method	00070914		OLD	

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Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1380	Storage Stability	00102107 00110622 00137902 00165525 41560202 42919201 43494701 43505201 44135001 48598605 48598606	PDGII PDGII	OLD OLD OLD OLD OLD OLD OLD OLD OLD OWN OWN	
860.1500	Magnitude of the Residue in Plants: alfalfa (including grown for seed)	00025992 00026551-52 00047632 00047634-35 00151832 40072401 42909001 43343101		OLD OLD OLD OLD OLD OLD OLD OLD	
860.1500	Magnitude of the Residue in Plants: almond	00100520 00110564 42322903 43938801		OLD OLD OLD OLD	

Signature 	Name and Title Nicole O'Loughlin Senior Regulatory Consultant	Date Oct. 3, 2019
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DATA MATRIX

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Applicant's/Registrant's Name & Address UPL NA Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406	Product Permethrin Technical	
Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1500	Magnitude of the Residue in Plants: artichoke	00145266 42137201		OLD OLD	
860.1500	Magnitude of the Residue in Plants: asparagus	40446401-02		OLD	
860.1500	Magnitude of the Residue in Plants: avocado	00144307 41565401 44229501		OLD OLD OLD	
860.1500	Magnitude of the Residue in Plants: broccoli	00034774 00034778 00080054 41065802 43903501		OLD OLD OLD OLD OLD	
860.1500	Magnitude of the Residue in Plants: Brussels sprouts	00034775 00080054		OLD OLD	
860.1500	Magnitude of the Residue in Plants: cabbage	00034779 00080054-55 00080057-58 00110693 00156265 41065802 48598601	PDGII	OLD OLD OLD OLD OLD OLD OWN	

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Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1500	Magnitude of the Residue in Plants: cavallo broccolo	00034774 00034778-89 00080054-55 00080057-58 00105293 00110693 00155947 00156265 41065802 41575901 43903501		OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD	
860.1500	Magnitude of the Residue in Plants: cauliflower	00034776 00080054 41065802		OLD OLD OLD	
860.1500	Magnitude of the Residue in Plants: cherry	41065803 44135001		OLD OLD	

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Applicant's/Registrant's Name & Address UPL NA Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406	Product Permethrin Technical	
Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1500	Magnitude of the Residue in Plants: Chinese broccoli	00034774 00034778-89 00080054-55 00080057-58 00105293 00110693 00155947 00156265 41065802 41575901 43903501		OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD	
860.1500	Magnitude of the Residue in Plants: Chinese cabbage	00034774 00034778-89 00080054-55 00080057-58 00105293 00110693 00155947 00156265 41065802 41575901 43903501 48598601	PDGII	OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD OWN	

Signature 	Name and Title Nicole O'Loughlin Senior Regulatory Consultant	Date Oct. 3, 2019
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Applicant's/Registrant's Name & Address UPL NA Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406	Product Permethrin Technical	
Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1500	Magnitude of the Residue in Plants: collards	00150293 00155947 41575901 48639202	PDGII	OLD OLD OLD OWN	
860.1500	Magnitude of the Residue in Plants: corn (field, pop, sweet, grown for seed)	00034777-78 00069651-52 00088973 41052402 41065804 43149501 43350503 43364701-02		OLD OLD OLD OLD OLD OLD OLD OLD	
860.1500	Magnitude of the Residue in Plants: cucurbit vegetables, crop group 9	00126691 00151251 00155167 40556801-03 41565402 41565405 44182701-02		OLD OLD OLD OLD OLD OLD OLD	
860.1500	Magnitude of the Residue in Plants: eggplant	00129296 41565403		OLD OLD	
860.1500	Magnitude of the Residue in Plants: filbert (hazelnut)	00142263		OLD	
860.1500	Magnitude of the Residue in Plants: garlic	40404001		OLD	

Signature 	Name and Title Nicole O'Loughlin Senior Regulatory Consultant	Date Oct. 3, 2019
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Applicant's/Registrant's Name & Address UPL NA Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406		Product Permethrin Technical			
Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1500	Magnitude of the Residue in Plants: horseradish	00094610 41565404		OLD OLD	
860.1500	Magnitude of the Residue in Plants: kiwifruit	00072579-80 00072585		OLD OLD	
860.1500	Magnitude of the Residue in Plants: kohlrabi	00034774 00034778-89 00080054-55 00080057-58 00105293 00110693 00155947 00156265 41065802 41575901 43903501		OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD	

Signature 	Name and Title Nicole O'Loughlin Senior Regulatory Consultant	Date Oct. 3, 2019
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Applicant's/Registrant's Name & Address

UPL NA Inc.
630 Freedom Business Center, Suite 402
King of Prussia, PA 19406

Product

Permethrin Technical

Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1500	Magnitude of the Residue in Plants: leafy vegetables (except brassica vegetables), crop group 4	00025921 00034780-81 00081628 00102082 00110622 00139530 00140140 00150293 00155947 00156265 41065808 41575901 42322904 42431401 42979901 43350501-02		OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD	
860.1500	Magnitude of the Residue in Plants: mushrooms	00165524		OLD	
860.1500	Magnitude of the Residue in Plants: nectarines	00118504 43348101		OLD OLD	
860.1500	Magnitude of the Residue in Plants: onion	40404001		OLD	
860.1500	Magnitude of the Residue in Plants: papaya	00144307 41565401 44453101		OLD OLD OLD	

Signature

Name and Title

Nicole O'Loughlin
Senior Regulatory Consultant

Date

Oct. 3, 2019



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Applicant's/Registrant's Name & Address

UPL NA Inc.
630 Freedom Business Center, Suite 402
King of Prussia, PA 19406

Product

Permethrin Technical

Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1500	Magnitude of the Residue in Plants: parsley	00025921		OLD	
		00034780-81		OLD	
		00081628		OLD	
		00102082		OLD	
		00110622		OLD	
		00139530		OLD	
		00140140		OLD	
		00150293		OLD	
		00155947		OLD	
		00156265		OLD	
		41065808		OLD	
		41575901		OLD	
		42322904		OLD	
		42431401		OLD	
		42979901		OLD	
		43350501-02		OLD	
860.1500	Magnitude of the Residue in Plants: peach	00118504		OLD	
		43348101		OLD	
860.1500	Magnitude of the Residue in Plants: peppers (bell)	00129296		OLD	
		41565403		OLD	
		43494701		OLD	
		43498101		OLD	

Signature

Name and Title

Nicole O'Loughlin
Senior Regulatory Consultant

Date

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Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1500	Magnitude of the Residue in Plants: pistachio	00133293 41065805 41641002		OLD OLD OLD	
860.1500	Magnitude of the Residue in Plants: pome fruits, crop group 11	00042620-21 00083972 42322905 42838101		OLD OLD OLD OLD	
860.1500	Magnitude of the Residue in Plants: potato	00025985-86 00081578-79 43343102 44162601		OLD OLD OLD OLD	
860.1500	Magnitude of the Residue in Plants: range grasses	00128728 41565406 48598603	PDGII	OLD OLD OWN	

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Applicant's/Registrant's Name & Address UPL NA Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406	Product Permethrin Technical	
Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1500	Magnitude of the Residue in Plants: roquette (arugula)	00025921		OLD	
		00034780-81		OLD	
		00081628		OLD	
		00102082		OLD	
		00110622		OLD	
		00139530		OLD	
		00140140		OLD	
		00150293		OLD	
		00155947		OLD	
		00156265		OLD	
		41065808		OLD	
		41575901		OLD	
		42322904		OLD	
		42431401		OLD	
		42979901		OLD	
		43350501-02		OLD	

Signature 	Name and Title Nicole O'Loughlin Senior Regulatory Consultant	Date Oct. 3, 2019
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Applicant's/Registrant's Name & Address UPL NA Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406	Product Permethrin Technical	

Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1500	Magnitude of the Residue in Plants: soybeans	00026542		OLD	
		00026548		OLD	
		00057091		OLD	
		00110622		OLD	
		00135413		OLD	
		00137902		OLD	
		00144855		OLD	
		00155947		OLD	
		00165525		OLD	
		43364704		OLD	
860.1500	Magnitude of the Residue in Plants: spinach	00150293		OLD	
		41065808		OLD	
		42431401		OLD	
		42979901		OLD	
		43350502		OLD	
860.1500	Magnitude of the Residue in Plants: tomatillos	00026543		OLD	
		00026546		OLD	
		00034785		OLD	
		00110622		OLD	
		00140140		OLD	
		41404301		OLD	
		42322903		OLD	

Signature

Name and Title

Nicole O'Loughlin
Senior Regulatory Consultant

Date

Oct. 3, 2019



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Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1500	Magnitude of the Residue in Plants: tomato	00026543 00026546 00034785 00110622 00140140 41404301 42322903		OLD OLD OLD OLD OLD OLD OLD	
860.1500	Magnitude of the Residue in Plants: turnips	00155947 41575901		OLD OLD	
860.1500	Magnitude of the Residue in Plants: walnut	00072833 42322906		OLD OLD	
860.1500	Magnitude of the Residue in Plants: watercress	00145971 00157481 41565407		OLD OLD OLD	
860.1520	Magnitude of the Residue in Processed Food or Feed: corn	42860601 42910101 43374601		OLD OLD OLD	
860.1520	Magnitude of the Residue in Processed Food or Feed: apple	42824702		OLD	
860.1520	Magnitude of the Residue in Processed Food or Feed: potato	42824701		OLD	
860.1520	Magnitude of the Residue in Processed Food or Feed: soybeans	00070912 43364703		OLD OLD	
860.1520	Magnitude of the Residue in Processed Food or Feed: tomato	41404301		OLD	

Signature 	Name and Title Nicole O'Loughlin Senior Regulatory Consultant	Date Oct. 3, 2019
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Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1480	Magnitude of the Residue in Meat, Milk, Poultry, and Eggs	00054723 00064674 00064676 00064679-80 00064682-86 00070914-15 00070917 00079385-87 00110624 41560201		OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD	
860.1400	Nature and Magnitude of the Residue in Potable Water				Not required
860.1400	Magnitude of the Residue in Fish				Not required
860.1400	Magnitude of the Residue in Plants Resulting from the Use of Irrigation Water				Not required
860.1460	Magnitude of the Residue in Food Handling Establishments				Not required
860.1900	Field Rotational Crops	44428201-03		OLD	

Signature 	Name and Title Nicole O'Loughlin Senior Regulatory Consultant	Date Oct. 3, 2019
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Data Matrix Endnotes for Permethrin Technical

- ¹ **830.1650** – These data are not required for registration of a technical grade active ingredient. Refer to guideline 830.1620.
- ² **830.6321** – Product is not used around electrical equipment.
- ³ **830.7200** – Product is a liquid.
- ⁴ **830.7370** – No significant acidic or basic moieties
- ⁵ **870.1100** – The study cited is acceptable and satisfies the data requirement as per the Jun. 30, 2017 *Permethrin: Human Health Draft Risk Assessment for Registration Review* (DP Barcode: D414137) (Human Health Risk Assessment).
- ⁶ **870.1200** – The study cited is acceptable and satisfies the data requirement as per the Human Health Risk Assessment.
- ⁷ **870.2400** – The study cited is acceptable and satisfies the data requirement as per the Human Health Risk Assessment.
- ⁸ **870.2500** – The study cited is acceptable and satisfies the data requirement as per the Human Health Risk Assessment.
- ⁹ **870.2600** – The Permethrin RED stated that these data are not required.
- ¹⁰ **850.2100** – The study cited is acceptable and satisfies the data requirement as per the June 20, 2011 *EFED Registration Review Preliminary Problem Formulation for Permethrin* (DP Barcode: D384703) (Problem Formulation) and the RED. Passerine data were required as per the Dec. 12, 2012 *Permethrin Generic Data Call-In* (GDCI-109701-1252) (2012 GDCI). These data were submitted under MRID No. 49511902.
- ¹¹ **850.2200** – The studies cited are acceptable and satisfy the data requirement as per the Problem Formulation.
- ¹² **850.2300** – The studies cited are acceptable and satisfy the data requirement as per the Problem Formulation.
- ¹³ **850.1075** – The studies cited are acceptable and satisfy the data requirement as per the Problem Formulation or the Sept. 30, 2016 *Preliminary Comparative Environmental Fate and Ecological Risk Assessment for the Registration Review of Eight Synthetic Pyrethroids and the Pyrethrins* (DP Barcodes: D425791, D429461, D433338, D433339, D435888) (EFED Risk Assessment).
- ¹⁴ **850.1010** – The studies cited are acceptable and satisfy the data requirement as per the Problem Formulation and the EFED Risk Assessment.
- ¹⁵ **850.1025, 850.1035, 850.1045, 850.1055, 850.1075** – The studies cited are acceptable and satisfy the data requirement as per the Problem Formulation or the EFED Risk Assessment. MRID No. 42584001 is also cited. Additional data were required as per the 2012 GDCI and were submitted under MRID No. 49511901.
- ¹⁶ **850.1300** – The study cited is acceptable and satisfies the data requirement as per the EFED Risk Assessment.
- ¹⁷ **850.1350** – The study cited is acceptable and satisfies the data requirement as per the EFED Risk Assessment.
- ¹⁸ **850.1400** – The study cited is acceptable and satisfies the data requirement as per the Problem Formulation and the EFED Risk Assessment.
- ¹⁹ **850.1400** – These data are not required as per the Problem Formulation and the EFED Risk Assessment.
- ²⁰ **850.1500** – The study cited is acceptable and satisfies the data requirement as per the Problem Formulation.

Data Matrix Endnotes for Permethrin Technical

- ²¹ **850.1710, 850.1730, 850.1850** – The studies cited are acceptable and satisfy the data requirement as per the Problem Formulation and the EFED Risk Assessment.
- ²² **N/A** – The studies cited are acceptable and satisfy the data requirement as per the EFED Risk Assessment.
- ²³ **850.3020** – The study cited is acceptable and satisfies the data requirement as per the Problem Formulation and the EFED Risk Assessment.
- ²⁴ **850.3030** – The study cited is acceptable and satisfies the data requirement as per the Problem Formulation and the EFED Risk Assessment.
- ²⁵ **850.3040** – As per the Problem Formulation, these data are reserved pending the requirement for a refined pollinator risk assessment.
- ²⁶ **870.6200** – The studies cited are acceptable and satisfy the data requirement as per the Human Health Risk Assessment.
- ²⁷ **870.3100** – The studies cited are acceptable and satisfy the data requirement as per the Human Health Risk Assessment.
- ²⁸ **870.3150** – The studies cited are acceptable and satisfy the data requirement as per the Human Health Risk Assessment.
- ²⁹ **870.3200** – The studies cited are acceptable and satisfy the data requirement as per the Human Health Risk Assessment. Note: an invalid MRID was referenced in the Human
- ³⁰ **870.3250** – These data are not required as per the Human Health Risk Assessment.
- ³¹ **870.3465** – The study cited is acceptable and satisfies the data requirement as per the Human Health Risk Assessment.
- ³² **870.6200** – The studies cited are acceptable and satisfy the data requirement as per the Human Health Risk Assessment.
- ³³ **870.4100** – The studies cited are acceptable and satisfy the data requirement as per the Human Health Risk Assessment.
- ³⁴ **870.4200** – The studies cited are acceptable and satisfy the data requirement as per the Human Health Risk Assessment.
- ³⁵ **870.3700** – The studies cited are acceptable and satisfy the data requirement as per the Human Health Risk Assessment.
- ³⁶ **870.3800** – The studies cited are acceptable and satisfy the data requirement as per the Human Health Risk Assessment.
- ³⁷ **870.6300** – These data are not required as per the Human Health Risk Assessment.
- ³⁸ **870.5100** – The study cited is acceptable and satisfies the data requirement as per the RED and the June 15, 2011 *Permethrin: Registration Review Scoping Document for Human Health Assessments* (DP Barcode: D384702) (Scoping Document). The MRID referenced in the Human Health Risk Assessment appears to be an error.
- ³⁹ **870.5385, 870.5395, 870.5450, 870.5550** – The studies cited are acceptable and satisfy the data requirement as per the RED and the Scoping Document. The MRID Nos. referenced in the Human Health Risk Assessment appear to be in error.
- ⁴⁰ **870.7485** – The studies cited are acceptable and satisfy the data requirement as per the RED or the Human Health Scoping Document. MRID Nos. 00065903 and 00102185 are also cited.
- ⁴¹ **870.7600** – The study cited is acceptable and satisfies the data requirement as per the Human Health Risk Assessment.
- ⁴² **870.7800** – These data are not required as per the Human Health Risk Assessment.

Data Matrix Endnotes for Permethrin Technical

- ⁴³ **875.1100, 875.1200, 875.1300, 875.1400, 875.1500, 875.1600, 875.1700** – UPL NA Inc. is a member is good standing of the Agricultural Handler Exposure Task Force (AHETF).
- ⁴⁴ **875.2200, 875.2300, 875.2400, 875.2500, 875.2600, 875.2700, 875.2800, 875.2900, 875.3000** – UPL NA Inc. is a member is good standing of the Agricultural Reentry Task Force (ARTF) and the Outdoor Residential Exposure Task Force (ORETF).
- ⁴⁵ **201-1, 202-1** – UPL NA Inc. is a member is good standing of the Spray Drift Task Force (SDTF).
- ⁴⁶ **890.1100** – The study cited is acceptable and satisfies the data requirement as per the June 29, 2015 EPA Memorandum *Permethrin: Data Evaluation Records (DERs) for EDSP Tier 1 Assays* (DP Barcodes: D398301, D401793, D405670) (EDSP DERs).
- ⁴⁷ **890.1150, 890.1250, 890.1300, 890.1600** – As per the EDSP DERs, this data requirement is not applicable, and the requirement has been satisfied by other scientifically relevant information (OSRI).
- ⁴⁸ **890.1200** – The study cited is acceptable and satisfies the data requirement as per the EDSP DERs.
- ⁴⁹ **890.1350** – The study cited is acceptable and satisfies the data requirement as per the EDSP DERs.
- ⁵⁰ **890.1400** – The study cited is acceptable and satisfies the data requirement as per the EDSP DERs.
- ⁵¹ **890.1450** – The study cited is acceptable and satisfies the data requirement as per the EDSP DERs.
- ⁵² **890.1500** – The study cited is acceptable and satisfies the data requirement as per the EDSP DERs.
- ⁵³ **890.15500** – The study cited is acceptable and satisfies the data requirement as per the EDSP DERs.
- ⁵⁴ **850.4100** – These data were required as per the 2012 GDCI. The study cited was submitted to satisfy the data gap.
- ⁵⁵ **850.4150** – These data were required as per the 2012 GDCI. The study cited was submitted to satisfy the data gap.
- ⁵⁶ **850.4400, 850.4500** – The studies cited are acceptable and satisfy the data requirement as per the EFED Risk Assessment.
- ⁵⁷ **850.4550** – The study cited is acceptable and satisfies the data requirement as per the EFED Risk Assessment.
- ⁵⁸ **835.2120** – The study cited is acceptable and satisfies the data requirement as per the EFED Risk Assessment.
- ⁵⁹ **835.2240** – The study cited is supplemental and additional data were required as per the 2012 GDCI. These data were submitted under MRID No. 49542801.
- ⁶⁰ **835.2410** – The study cited is acceptable and satisfies the data requirement as per the EFED Risk Assessment.
- ⁶¹ **835.4100** – The study cited partially satisfies the data requirement as per the Problem Formulation and additional data were required as per the 2012 GDCI. These data were submitted under MRID No. 49622001.
- ⁶² **835.4200** – The study cited partially satisfies the data requirement as per the Problem Formulation and additional data were required as per the 2012 GDCI. These data were submitted under MRID No. 49728101.
- ⁶³ **835.4300** – The study cited partially satisfies the data requirement as per the Problem Formulation and additional data were required as per the 2012 GDCI. These data were submitted under MRID No. 49624902.
- ⁶⁴ **835.4400** – The study cited partially satisfies the data requirement as per the Problem Formulation and additional data were required as per the 2012 GDCI. These data were submitted under MRID No. 49624903.

Data Matrix Endnotes for Permethrin Technical

⁶⁵ **835.1230** – The studies cited partially satisfy the data requirement as per the Problem Formulation and additional data were required as per the 2012 GDCI. These data were submitted under MRID No. 49624901.

 EPA	United States Environmental Protection Agency Washington, DC 20460	<input type="checkbox"/> Registration <input checked="" type="checkbox"/> Amendment <input type="checkbox"/> Other	OPP Identifier Number
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Application for Pesticide - Section I

1. Company/Product Number UPL Delaware, Inc./91813-13	2. EPA Product Manager Elizabeth Fertich	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Permethrin Technical	PM# 4	
5. Name and Address of Applicant (Include ZIP Code) UPL Delaware, Inc. 630 Freedom Business Center, Ste. 402 King of Prussia, PA 19406 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____

Section - II

<input checked="" type="checkbox"/> Amendment – Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application <input type="checkbox"/> Other - Explain below
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Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

PRIA category R351 - Amendment adding a new unregistered source of active ingredient. Please see cover letter for additional details.

Section - III

1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" No. per Unit Packaging wgt. container	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" No. per Package wgt. container	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify)
* Certification must be submitted			
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On labeling accompanying product
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Other _____ <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)		
Name Crystal Layton	Title Regulatory Manager	Telephone No. (Include Area Code) 229-583-3006
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received <div style="text-align: center; border: 1px solid black; padding: 5px;">(Stamped)</div>
2. Signature 	3. Title Regulatory Manager	
4. Typed Name Crystal Layton	5. Date 12/17/2019	



UPL Delaware, Inc.
630 Freedom Business Center
Suite 402
King of Prussia, PA 19406

Tel: 610-491-2800
Fax: 610-491-2860

January 10, 2017

To Whom It May Concern:

Re: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Pyxis Regulatory Consulting, Inc. is authorized to act as Consultant for UPL Delaware, Inc. (EPA Company Number 91813), before the U.S. Environmental Protection Agency and state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), 7 U.S.C. § 136 et seq. and state law. This is a change from their previous status as Agent.

If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read 'M Palac'.

Madeline Palac
Treasurer/Director

Cc: Pyxis Regulatory Consulting, Inc.



4110 136TH ST CT NW
GIG HARBOR, WA 98332
T: (253) 853-7369
F: (253) 853-5516
NICOLE@PYXISRC.COM

Oct. 3, 2019

ELECTRONIC SUBMISSION

Beth Fertich (PM 4)
Document Processing Desk (**AMEND**)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

RE: UPL Delaware, Inc., Permethrin Technical (EPA Reg. No. 91813-13)
PRIA R352 Amendment; Adding Approved Uses; Selective-cite

Dear Ms. Fertich,

On behalf of UPL Delaware, Inc., we are submitting an application to amend the registration of Permethrin Technical (EPA Reg. No. 91813-13) to add approved food uses to the label. These uses are found on several end-use product labels (EPA Reg. Nos. 70506-09 and 70506-66). The uses being added have established tolerances for permethrin according to CFR §180.378 and the revised crop group listings are consistent with 40 CFR §180.41. In addition to consistency with the tolerance expression for permethrin, the revised crop grouping is found on several end-use product labels (EPA Reg. Nos. 89459-45 and 8329-34). UPL Delaware, Inc. wants to ensure that its technical label is as comprehensive as possible.

In support of this label amendment, we are submitting the following documents:

1. Application for Amended Pesticide Registration (EPA Form 8570-1)
2. One (1) copy of Permethrin Technical Label with changes tracked
3. One (1) copy of Permethrin Technical Label with changes incorporated
4. Certification with Respect to Citation of Data (EPA Form 8570-34)
5. Agency Internal Use Copy of the Data Matrix (EPA Form 8570-35)
6. Public File Copy of the Data Matrix (EPA Form 8570-35)
7. Copy of PRIA receipt of payment
8. Letter of Authorization

UPL Delaware, Inc. is using the selective-cite method of support. As per EPA's interpretations of 40 CFR Parts 152.90 - 152.96, UPL Delaware, Inc. submitted notices of intent to apply and offers to pay to the extent required by FIFRA § 3(c)(1)(F). The PRIA fee for this action is \$13,888.00 and has been paid. It falls under PRIA Category R352.

Please contact me ((253) 853-7369, Nicole@PyxisRC.com) if you have any questions or need any additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Nicole O'Loughlin".

Nicole O'Loughlin

Enclosures

cc: C. Layton; UPL Delaware, Inc.

Commercial/financial information may be entitled to confidential treatment



Confirmation

Your payment has been submitted to the designated government agency through Pay.gov and the details are below. Please note that this is just a confirmation of transaction submission. To confirm that the payment processed as expected, you may refer to your bank statement on the scheduled payment date. If you have any questions or wish to cancel this payment, you will need to contact the agency you paid at your earliest convenience.

Tracking Information

Pay.gov Tracking ID: 26KKALBC

Agency Tracking ID: 75854376894

Form Name: Pesticide Registration Improvement Act - Prepayment

Application Name: PRIA Service Fees

Payment Information

Payment Type: Bank account (ACH)

Payment Amount: \$13,888.00

Transaction Date: 10/03/2019 02:22:19 PM EDT

Payment Date: 10/04/2019

Registration Number: 91813-13

Company Name: UPL Delaware Inc.

Company Number: 91813

Action Code: R352

Account Information

Account Holder Name: UPL NA Inc.

Routing Number: [REDACTED]

Account Number: *****2762



UPL Delaware, Inc.
630 Freedom Business Center
Suite 402
King of Prussia, PA 19406

Tel: 610-491-2800
Fax: 610-491-2860

December 17, 2019

MRID 51024200

VIA CDX

Elizabeth Fertich, PM 4
Registration Division, IVB1
Document Processing Desk (REGFEE)
US Environmental Protection Agency
Office of Pesticide Programs (7505P)
One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

☎ 703-347-8560

**Subject: Alternate Source Amendment PRIA R351
PERMETHRIN TECHNICAL
(EPA Reg. No. 91813-13)**

Dear Ms. Fertich,

This amendment submission is being made to add an alternate unregistered source of active ingredient to the registration of PERMETHRIN TECHNICAL (EPA Reg. No. 91813-13).

The following are provided in support of this amendment:

- Application for Pesticide Registration, EPA form 8570-1
- Receipt of PRIA pre-payment from pay.gov
- Confidential Statement of Formula, EPA Form 8570-4 (Alternate Formulation #2)
- Certification with Respect to Citation of Data, EPA Form 8570-34
- Agency Internal Use Copy of the Data Matrix, EPA Form 8570-35
- Public File Copy of the Data Matrix, EPA Form 8570-35
- Data to support this amendment:

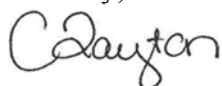
Guideline	Study Title	MRID No.
830.1550, 830.1600, 830.1620, 830.1670, 830.1750	Permethrin Technical Product Identity and Composition, Description of Materials Used, Description of the Production Process, Discussion of the Formation of Impurities, and Certified Limits. Study No. UPLD-2019-3	51024201

Guideline	Study Title	MRID No.
830.1700, 830.1800	Five Batch Analysis of Permethrin Technical. Study No. G15155	51024202

This new source of permethrin qualifies as an alternate to our existing manufacturing document on file with the Agency for this registration. This action falls under PRIA category R351 (Amendment adding a new unregistered source of active ingredient). The fee for this action is \$13,888 and has been paid.

Should you require additional information or have questions concerning this submission, please contact me via email at crystal.layton@upl-ltd.com or phone at 229-583-3006.

Sincerely,



Crystal Layton
Regulatory Manager



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
1200 Pennsylvania Avenue, N.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collection Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the completed form to this address.

Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number UPL Delaware, Inc., 630 Freedom Business Center, Suite 402, King of Prussia, PA 19406	229-583-3006 EPA Registration Number/File Symbol 91813-13
Active Ingredient(s) and/or representative test compound(s) Permethrin	Date 12/17/2019
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) technical grade active ingredient-terrestrial food, non-food	Product Name Permethrin Technical

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

<input type="checkbox"/> I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	<input checked="" type="checkbox"/> I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).
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SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature 	Date 12/17/2019	Typed or Printed Name and Title Crystal Layton, Regulatory Manager
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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DATA MATRIX

Date December 17, 2019	EPA Reg No./File Symbol 91813-13	Page 1 of 30
Applicant's/Registrant's Name & Address UPL NA Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406	Product Permethrin Technical	
Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
PRODUCT SPECIFIC DATA REQUIREMENTS					
830.1550	Product Identity and Composition	44841201 51024201	UPL NA Inc.	OWN	
830.1600	Description of Materials Used to Produce the Product	44841201 51024201	UPL NA Inc.	OWN	
830.1620	Description of the Production Process	44841201 51024201	UPL NA Inc.	OWN	
830.1650	Description of the Formulation Process				Not required ¹
830.1670	Discussion of Formation of Impurities	44841201 51024201	UPL NA Inc.	OWN	
830.1700	Preliminary Analysis	44841201 50127101 51024202	UPL NA Inc. UPL NA Inc.	OWN OWN	
830.1750	Certified Limits	44841201 51024201	UPL NA Inc.	OWN	
830.1800	Enforcement Analytical Method	44841201 51024202	UPL NA Inc.	OWN	
830.6302	Color	44841202	UPL NA Inc.	OWN	
830.6303	Physical State	44841202	UPL NA Inc.	OWN	
830.6304	Odor	44841201	UPL NA Inc.	OWN	
830.6313	Stability to Normal and Elevated Temperatures, Metals and Metal Ions	44841202	UPL NA Inc.	OWN	

Signature 	Name and Title Crystal Layton Regulatory Manager	Date 1217/2019
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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DATA MATRIX

Date December 17, 2019	EPA Reg No./File Symbol 91813-13	Page 2 of 30
Applicant's/Registrant's Name & Address UPL NA Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406	Product Permethrin Technical	

Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6314	Oxidation / Reduction: Chemical Incompatibility	44841202	UPL NA Inc.	OWN	
830.6315	Flammability	44841202	UPL NA Inc.	OWN	
830.6316	Explosibility	44841202	UPL NA Inc.	OWN	
830.6317	Storage Stability	48881501	UPL NA Inc.	OWN	
830.6319	Miscibility	44841202	UPL NA Inc.	OWN	
830.6320	Corrosion Characteristics	48881501	UPL NA Inc.	OWN	
830.6321	Dielectric Breakdown Voltage				Not required ²
830.7000	pH	44841202	UPL NA Inc.	OWN	
830.7050	UV / Visible Absorption	44841202	UPL NA Inc.	OWN	
830.7100	Viscosity	44841202	UPL NA Inc.	OWN	
830.7200	Melting Point / Melting Range				Not required ³
830.7220	Boiling Point / Boiling Range	44841202	UPL NA Inc.	OWN	
830.7300	Density / Relative Density / Bulk Density	44841202	UPL NA Inc.	OWN	
830.7370	Dissociation Constants in Water				Not required ⁴
830.7520	Particle Size, Fiber Length, and Diameter Distribution				Not required
830.7550	Partition Coefficient (n-octanol/water), Shake Flask Method	44841202	UPL NA Inc.	OWN	
830.7560	Partition Coefficient (n-octanol/water), Generator Method				See 830.7550
830.7570	Partition Coefficient (n-octanol/water), Estimation by Liquid Chromatography				See 830.7550
830.7840	Water Solubility: Column Elution Method, Shake Flask Method	44841202	UPL NA Inc.	OWN	
830.7860	Water Solubility: Generator Column Method				See 830.7840

Signature 	Name and Title Crystal Layton Regulatory Manager	Date 12/17/2019
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401 M Street, S.W.
WASHINGTON, D.C. 20460

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DATA MATRIX

Date December 17, 2019	EPA Reg No./File Symbol 91813-13	Page 3 of 30
Applicant's/Registrant's Name & Address UPL NA Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406	Product Permethrin Technical	
Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7950	Vapor Pressure	44841202	UPL NA Inc.	OWN	
870.1100	Acute Oral Toxicity – rat	00242899		OLD	See endnote ⁵
870.1200	Acute Dermal Toxicity – rat	00242899		OLD	See endnote ⁶
870.1300	Acute Inhalation Toxicity – rat	41031103		OLD	
870.2400	Eye Irritation	00242899		OLD	See endnote ⁷
870.2500	Skin Irritation	00242899		OLD	See endnote ⁸
870.2600	Skin Sensitization				Not required ⁹
PERMETHRIN GENERIC DATA REQUIREMENTS					
850.2100	Acute Avian Oral Toxicity	41888401 49511902	Permethrin Data Group II Steering Committee/Joint Venture (PDGII)	OLD OWN	See endnote ¹⁰
850.2200	Acute Avian Dietary Toxicity	41888402 41888403		OLD OLD	See endnote ¹¹
850.2400	Wild Mammal Toxicity				Not required / See 870 series
850.2300	Avian Reproductive Toxicity	42322901 42322902		OLD OLD	See endnote ¹²
850.2500	Simulated or Actual Field Testing				Not required

Signature 	Name and Title Crystal Layton Regulatory Manager	Date 1217/2019
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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DATA MATRIX

Date December 17, 2019	EPA Reg No./File Symbol 91813-13	Page 4 of 30
Applicant's/Registrant's Name & Address UPL NA Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406	Product Permethrin Technical	
Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
850.1075	Freshwater Fish Toxicity	00110663 00110657 49540301	PDGII	OLD OLD OWN	See endnote ¹³
850.1010	Freshwater Invertebrate Toxicity	00110662 00110663		OLD OLD	See endnote ¹⁴
850.1025, 850.1035, 850.1045, 850.1055, 850.1075	Acute Toxicity Estuarine and Marine Organisms	41874901 42584001 43492902 49511901	PDG II	OLD OLD OLD OWN	See endnote ¹⁵
850.1300	Aquatic Invertebrate Life Cycle (Freshwater)	43745701		OLD	See endnote ¹⁶
850.1350	Aquatic Invertebrate Life Cycle (Saltwater)	49554601	PDG II	OWN	See endnote ¹⁷
850.1400	Fish Early Life Stage (Freshwater)	00110666		OLD	See endnote ¹⁸
850.1400	Fish Early Life Stage (Saltwater)				Not required ¹⁹
850.1500	Life Cycle Fish	00161436		OLD	See endnote ²⁰
850.1710, 850.1730, 850.1850	Aquatic Organisms Bioavailability, Biomagnification, Toxicity	41300401 41300402 41300403		OLD OLD OLD	See endnote ²¹
850.1950	Simulated or Actual Field Testing for Aquatic Organisms				Not required
850.1735	Whole Sediment: Acute Freshwater Invertebrates				Not required
850.1740	Whole Sediment: Acute Marine Invertebrates				Not required

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Applicant's/Registrant's Name & Address UPL NA Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406	Product Permethrin Technical	
Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
N/A	Whole Sediment: Chronic Invertebrates Freshwater and Marine	48788101 48788301 49063101	PDGII PDGII PDGII	OWN OWN OWN	See endnote ²²
850.3020	Honey Bee Acute Contact Toxicity	42674501		OLD	See endnote ²³
850.3030	Honeybee Toxicity of Residues on Foliage	42009301		OLD	See endnote ²⁴
850.3040	Field Testing for Pollinators				Reserved ²⁵
SS-1149	Aquatic Invertebrate Acute Toxicity	49513901	PDGII	OWN	
870.6100	Delayed Neurotoxicity (Acute) – Hen				Not required
870.6200	Acute Neurotoxicity – Rat	43046301 45657401		OLD OLD	See endnote ²⁶
870.3100	90-Day Oral: Rodent	00025914 00025915 00040491 00054737 00070577		OLD OLD OLD OLD OLD	See endnote ²⁷
870.3150	90-Day Oral: Non-Rodent	00029832 00043722 00070576 00071951		OLD OLD OLD OLD	See endnote ²⁸
870.3200	21/28-Day Dermal Toxicity	41143801 42653301		OLD OLD	See endnote ²⁹

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Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.3250	90-Day Dermal Toxicity				Not required ³⁰
870.3465	90-Day Inhalation Toxicity	00096713		OLD	See endnote ³¹
870.6100	28-Day Delayed Neurotoxicity – Hen				Not required
870.6200	90-Day Neurotoxicity	00071952 40766807		OLD OLD	See endnote ³²
870.4100	Chronic Oral Rodent	00069701 00120268		OLD OLD	See endnote ³³
870.4200	Carcinogenicity	00069701 00069703 00069704 00102110 00120268 45597105		OLD OLD OLD OLD OLD OLD	See endnote ³⁴
870.3700	Reproduction / Developmental Toxicity Screening Test	40943602 40943603		OLD OLD	See endnote ³⁵
870.3800	2-Generation Reproduction: Rat	00102108 00120271		OLD OLD	See endnote ³⁶
870.6300	Developmental Neurotoxicity Study				Not required ³⁷
870.5100	Bacterial Reverse Mutation Test	41031107		OLD	See endnote ³⁸
870.5300, 870.5375	<i>In vitro</i> Mammalian Cell Assay				Not required
870.5385, 870.5395, 870.5450, 870.5550	<i>In vivo</i> Cytogenetics and Other Effects	40943604 42723302		OLD OLD	See endnote ³⁹


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Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.7485	Metabolism and Pharmacokinetics	00054719 00054720 00065903 00089006 00102185		OLD OLD OLD OLD OLD	See endnote ⁴⁰
870.7200	Companion Animal Safety				Not required / Formulation specific
870.7600	Dermal Penetration	43169001		OLD	See endnote ⁴¹
870.7800	Immunotoxicity				Not required ⁴²
875.1100	Dermal Exposure – Outdoor		Agricultural Handler Exposure TF	OWN	See endnote ⁴³
875.1200	Dermal Exposure – Indoor		Agricultural Handler Exposure TF	OWN	See endnote ⁴³
875.1300	Inhalation Exposure – Outdoor		Agricultural Handler Exposure TF	OWN	See endnote ⁴³
875.1400	Inhalation Exposure – Indoor		Agricultural Handler Exposure TF	OWN	See endnote ⁴³
875.1500	Biological Monitoring		Agricultural Handler Exposure TF	OWN	See endnote ⁴³
875.1600	Data Reporting and Calculations		Agricultural Handler Exposure TF	OWN	See endnote ⁴³
875.1700	Product Use Information		Agricultural Handler Exposure TF	OWN	See endnote ⁴³
875.2100	Dislodgeable Foliar Residue and Turf Transferable Residues	43755701 44955501		OLD OLD	
875.2200	Soil Residue Dissipation		Agricultural Reentry TF Outdoor Residential Exposure TF	OWN OWN	See endnote ⁴⁴
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Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
875.2400	Dermal Exposure		Agricultural Reentry TF Outdoor Residential Exposure TF	OWN OWN	See endnote ⁴⁴
875.2500	Inhalation Exposure		Agricultural Reentry TF Outdoor Residential Exposure TF	OWN OWN	See endnote ⁴⁴
875.2600	Biological Monitoring		Agricultural Reentry TF Outdoor Residential Exposure TF	OWN OWN	See endnote ⁴⁴
875.2700	Product Use Information		Agricultural Reentry TF Outdoor Residential Exposure TF	OWN OWN	See endnote ⁴⁴
875.2800	Descriptions of Human Activity		Agricultural Reentry TF Outdoor Residential Exposure TF	OWN OWN	See endnote ⁴⁴
875.2900	Data Reporting and Calculations		Agricultural Reentry TF Outdoor Residential Exposure TF	OWN OWN	See endnote ⁴⁴
875.3000	Nondietary Ingestion Exposure		Agricultural Reentry TF Outdoor Residential Exposure TF	OWN OWN	See endnote ⁴⁴
201-1	Droplet Size Spectrum		Spray Drift TF	OWN	See endnote ⁴⁵
202-1	Droplet Size Spectrum		Spray Drift TF	OWN	See endnote ⁴⁵
890.1100	Amphibian Metamorphosis (Rat)	48988601	PDGII	OWN	See endnote ⁴⁶
890.1150	Androgen Receptor Binding (Rat Prostate)				Not applicable / See endnote ⁴⁷
890.1200	Aromatase (Human Recombinant)	48618601	PDGII	OWN	See endnote ⁴⁸

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Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
890.1250	Estrogen Receptor Binding				Not applicable / See endnote ⁴⁷
890.1300	Estrogen Receptor Transcriptional Activation Assay				Not applicable / See endnote ⁴⁷
890.1350	Fish Short-Term Reproduction	48702301	PDGII	OWN	See endnote ⁴⁹
890.1400	Hershberger (Rat)	48618602	PDGII	OWN	See endnote ⁵⁰
890.1450	Female Pubertal (Rat)	48672901	PDGII	OWN	See endnote ⁵¹
890.1500	Male Pubertal (Rat)	48687101	PDGII	OWN	See endnote ⁵²
890.1550	Steroidogenesis	48618603	PDGII	OWN	See endnote ⁵³
890.1600	Uterotrophic (Rat)				Not applicable / See endnote ⁴⁷
850.4100	Tier 1: Seedling Emergence	49475301	PDGII	OWN	See endnote ⁵⁴
850.4150	Tier 1: Vegetative Vigor	49475302	PDGII	OWN	See endnote ⁵⁵
850.4400, 850.4500	Tier 1: Aquatic Plant Growth	49398801	PDGII	OWN	See endnote ⁵⁶
		49398803	PDGII	OWN	
		49398804	PDGII	OWN	
		49398805	PDGII	OWN	
850.4100	Tier 2: Seedling Emergence	49475301	PDGII	OWN	See endnote ⁵⁴
850.4150	Tier 2: Vegetative Vigor	49475302	PDGII	OWN	See endnote ⁵⁵

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Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
850.4400, 850.4500	Tier 2: Aquatic Plant Growth	49398801 49398803 49398804 49398805	PDGII PDGII PDGII PDGII	OWN OWN OWN OWN	See endnote ⁵⁶
850.4300	Terrestrial Field				Not required
850.4450	Aquatic Field				Not required
850.4025	Target Area Phytotoxicity				Not required
850.4550	Cyanobacteria Toxicity	49398802	PDGII	OWN	See endnote ⁵⁷
835.2120	Hydrolysis	00102043			See endnote ⁵⁸
835.2240	Photodegradation in Water	40242801 49542801	PDGII	OLD OWN	See endnote ⁵⁹
835.2410	Photodegradation in Soil	40190101		OLD	See endnote ⁶⁰
835.2370	Photodegradation in Air				Not required
835.4100	Aerobic Soil Metabolism	42410002 49622001	PDGII	OLD OWN	See endnote ⁶¹
835.4200	Anaerobic Soil Metabolism	41970601 49728101	PDGII	OLD OWN	See endnote ⁶²
835.4300	Aerobic Aquatic Metabolism	43938201 49624902	PDGII	OLD OWN	See endnote ⁶³
835.4400	Anaerobic Aquatic Metabolism	43982001 49624903	PDGII	OLD OWN	See endnote ⁶⁴

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Date
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Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
835.1230	Leaching / Adsorption / Desorption	41868001 43424901 45170102 49624901	PDGII	OLD OLD OLD OWN	See endnote ⁶⁵
835.1410	Volatility – Laboratory				Not required
835.8100	Volatility – Field				Not required
835.6100	Soil Field Dissipation Study	42359101		OLD	
835.6200	Aquatic Sediment Field Dissipation Study	44030501 44157101		OLD OLD	
835.6300	Forest Field Dissipation Study				Not required
835.6400	Combination and Tank Mixes				Not required
835.7100	Ground Water Monitoring				Not required
850.6100	Environmental Chemistry Methods	49263701 49421001	PDGII PDGII	OWN OWN	
SS-1099	Leachability from Treated Wood	49638201 49638202	PDGII PDGII	OWN OWN	
SS-1065	POTW Treatability Study	48762906	Pyrethroid Working Group	PER	

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Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1300	Nature of the Residue: Plants	00025919 00025920 00094393 00094394 43307801		OLD OLD OLD OLD OLD	
860.1300	Nature of the Residue: Livestock	42196702-03 42410001 42503201 43458801-02 43505201 43713301-04 43962801 44196101-02 44417803		OLD OLD OLD OLD OLD OLD OLD OLD OLD	
860.1850	Confined Rotational Crops	43174401		OLD	

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Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1340	Residue Analytical Methods	00043877 00054724 00064675 00064678 00070916 00072582 00160394 40404002 40446403-04 40556804 41641001 42137202 43364705 43962801 44196103 44417801-02 44428204		OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD	
860.1360	Multiresidue Method	00070914		OLD	

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Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1380	Storage Stability	00102107 00110622 00137902 00165525 41560202 42919201 43494701 43505201 44135001 48598605 48598606	PDGII PDGII	OLD OLD OLD OLD OLD OLD OLD OLD OLD OWN OWN	
860.1500	Magnitude of the Residue in Plants: alfalfa (including grown for seed)	00025992 00026551-52 00047632 00047634-35 00151832 40072401 42909001 43343101		OLD OLD OLD OLD OLD OLD OLD OLD	
860.1500	Magnitude of the Residue in Plants: almond	00100520 00110564 42322903 43938801		OLD OLD OLD OLD	

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Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1500	Magnitude of the Residue in Plants: artichoke	00145266 42137201		OLD OLD	
860.1500	Magnitude of the Residue in Plants: asparagus	40446401-02		OLD	
860.1500	Magnitude of the Residue in Plants: avocado	00144307 41565401 44229501		OLD OLD OLD	
860.1500	Magnitude of the Residue in Plants: broccoli	00034774 00034778 00080054 41065802 43903501		OLD OLD OLD OLD OLD	
860.1500	Magnitude of the Residue in Plants: Brussels sprouts	00034775 00080054		OLD OLD	
860.1500	Magnitude of the Residue in Plants: cabbage	00034779 00080054-55 00080057-58 00110693 00156265 41065802 48598601	PDGII	OLD OLD OLD OLD OLD OLD OWN	

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Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1500	Magnitude of the Residue in Plants: cavallo broccolo	00034774 00034778-89 00080054-55 00080057-58 00105293 00110693 00155947 00156265 41065802 41575901 43903501		OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD	
860.1500	Magnitude of the Residue in Plants: cauliflower	00034776 00080054 41065802		OLD OLD OLD	
860.1500	Magnitude of the Residue in Plants: cherry	41065803 44135001		OLD OLD	

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Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1500	Magnitude of the Residue in Plants: Chinese broccoli	00034774 00034778-89 00080054-55 00080057-58 00105293 00110693 00155947 00156265 41065802 41575901 43903501		OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD	
860.1500	Magnitude of the Residue in Plants: Chinese cabbage	00034774 00034778-89 00080054-55 00080057-58 00105293 00110693 00155947 00156265 41065802 41575901 43903501 48598601	PDGII	OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD OWN	

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Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1500	Magnitude of the Residue in Plants: collards	00150293 00155947 41575901 48639202	PDGII	OLD OLD OLD OWN	
860.1500	Magnitude of the Residue in Plants: corn (field, pop, sweet, grown for seed)	00034777-78 00069651-52 00088973 41052402 41065804 43149501 43350503 43364701-02		OLD OLD OLD OLD OLD OLD OLD OLD	
860.1500	Magnitude of the Residue in Plants: cucurbit vegetables, crop group 9	00126691 00151251 00155167 40556801-03 41565402 41565405 44182701-02		OLD OLD OLD OLD OLD OLD OLD	
860.1500	Magnitude of the Residue in Plants: eggplant	00129296 41565403		OLD OLD	
860.1500	Magnitude of the Residue in Plants: filbert (hazelnut)	00142263		OLD	

Signature 	Name and Title Crystal Layton Regulatory Manager	Date 1217/2019
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DATA MATRIX

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Applicant's/Registrant's Name & Address	Product		Permethrin Technical		
UPL NA Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406					
Ingredient	Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)				

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1500	Magnitude of the Residue in Plants: garlic	40404001		OLD	
860.1500	Magnitude of the Residue in Plants: horseradish	00094610 41565404		OLD OLD	
860.1500	Magnitude of the Residue in Plants: kiwifruit	00072579-80 00072585		OLD OLD	
860.1500	Magnitude of the Residue in Plants: kohlrabi	00034774 00034778-89 00080054-55 00080057-58 00105293 00110693 00155947 00156265 41065802 41575901 43903501		OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD	

Signature 	Name and Title Crystal Layton Regulatory Manager	Date 1217/2019
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DATA MATRIX

Date December 17, 2019	EPA Reg No./File Symbol 91813-13	Page 20 of 30
Applicant's/Registrant's Name & Address UPL NA Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406	Product Permethrin Technical	
Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1500	Magnitude of the Residue in Plants: leafy vegetables (except brassica vegetables), crop group 4	00025921 00034780-81 00081628 00102082 00110622 00139530 00140140 00150293 00155947 00156265 41065808 41575901 42322904 42431401 42979901 43350501-02		OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD	
860.1500	Magnitude of the Residue in Plants: mushrooms	00165524		OLD	
860.1500	Magnitude of the Residue in Plants: nectarines	00118504 43348101		OLD OLD	
860.1500	Magnitude of the Residue in Plants: onion	40404001		OLD	
860.1500	Magnitude of the Residue in Plants: papaya	00144307 41565401 44453101		OLD OLD OLD	

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DATA MATRIX

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Applicant's/Registrant's Name & Address

UPL NA Inc.

630 Freedom Business Center, Suite 402

King of Prussia, PA 19406

Product

Permethrin Technical

Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1500	Magnitude of the Residue in Plants: parsley	00025921		OLD	
		00034780-81		OLD	
		00081628		OLD	
		00102082		OLD	
		00110622		OLD	
		00139530		OLD	
		00140140		OLD	
		00150293		OLD	
		00155947		OLD	
		00156265		OLD	
		41065808		OLD	
		41575901		OLD	
		42322904		OLD	
		42431401		OLD	
		42979901		OLD	
		43350501-02		OLD	
860.1500	Magnitude of the Residue in Plants: peach	00118504		OLD	
		43348101		OLD	
860.1500	Magnitude of the Residue in Plants: peppers (bell)	00129296		OLD	
		41565403		OLD	
		43494701		OLD	
		43498101		OLD	

Signature

Name and Title

Crystal Layton

Regulatory Manager

Date

1217/2019



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DATA MATRIX

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Applicant's/Registrant's Name & Address UPL NA Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406	Product Permethrin Technical	
Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1500	Magnitude of the Residue in Plants: pistachio	00133293 41065805 41641002		OLD OLD OLD	
860.1500	Magnitude of the Residue in Plants: pome fruits, crop group 11	00042620-21 00083972 42322905 42838101		OLD OLD OLD OLD	
860.1500	Magnitude of the Residue in Plants: potato	00025985-86 00081578-79 43343102 44162601		OLD OLD OLD OLD	
860.1500	Magnitude of the Residue in Plants: range grasses	00128728 41565406 48598603	PDGII	OLD OLD OWN	

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Date December 17, 2019	EPA Reg No./File Symbol 91813-13	Page 23 of 30
Applicant's/Registrant's Name & Address UPL NA Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406	Product Permethrin Technical	
Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1500	Magnitude of the Residue in Plants: roquette (arugula)	00025921		OLD	
		00034780-81		OLD	
		00081628		OLD	
		00102082		OLD	
		00110622		OLD	
		00139530		OLD	
		00140140		OLD	
		00150293		OLD	
		00155947		OLD	
		00156265		OLD	
		41065808		OLD	
		41575901		OLD	
		42322904		OLD	
		42431401		OLD	
		42979901		OLD	
		43350501-02		OLD	

Signature 	Name and Title Crystal Layton Regulatory Manager	Date 1217/2019
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DATA MATRIX

Date December 17, 2019	EPA Reg No./File Symbol 91813-13	Page 24 of 30
Applicant's/Registrant's Name & Address UPL NA Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406	Product Permethrin Technical	
Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1500	Magnitude of the Residue in Plants: soybeans	00026542		OLD	
		00026548		OLD	
		00057091		OLD	
		00110622		OLD	
		00135413		OLD	
		00137902		OLD	
		00144855		OLD	
		00155947		OLD	
		00165525		OLD	
		43364704		OLD	
860.1500	Magnitude of the Residue in Plants: spinach	00150293		OLD	
		41065808		OLD	
		42431401		OLD	
		42979901		OLD	
		43350502		OLD	
860.1500	Magnitude of the Residue in Plants: tomatillos	00026543		OLD	
		00026546		OLD	
		00034785		OLD	
		00110622		OLD	
		00140140		OLD	
		41404301		OLD	
		42322903		OLD	

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Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1500	Magnitude of the Residue in Plants: tomato	00026543 00026546 00034785 00110622 00140140 41404301 42322903		OLD OLD OLD OLD OLD OLD OLD	
860.1500	Magnitude of the Residue in Plants: turnips	00155947 41575901		OLD OLD	
860.1500	Magnitude of the Residue in Plants: walnut	00072833 42322906		OLD OLD	
860.1500	Magnitude of the Residue in Plants: watercress	00145971 00157481 41565407		OLD OLD OLD	
860.1520	Magnitude of the Residue in Processed Food or Feed: corn	42860601 42910101 43374601		OLD OLD OLD	
860.1520	Magnitude of the Residue in Processed Food or Feed: apple	42824702		OLD	
860.1520	Magnitude of the Residue in Processed Food or Feed: potato	42824701		OLD	
860.1520	Magnitude of the Residue in Processed Food or Feed: soybeans	00070912 43364703		OLD OLD	
860.1520	Magnitude of the Residue in Processed Food or Feed: tomato	41404301		OLD	

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Applicant's/Registrant's Name & Address UPL NA Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406	Product Permethrin Technical	
Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1480	Magnitude of the Residue in Meat, Milk, Poultry, and Eggs	00054723 00064674 00064676 00064679-80 00064682-86 00070914-15 00070917 00079385-87 00110624 41560201		OLD OLD OLD OLD OLD OLD OLD OLD OLD OLD	
860.1400	Nature and Magnitude of the Residue in Potable Water				Not required
860.1400	Magnitude of the Residue in Fish				Not required
860.1400	Magnitude of the Residue in Plants Resulting from the Use of Irrigation Water				Not required
860.1460	Magnitude of the Residue in Food Handling Establishments				Not required
860.1900	Field Rotational Crops	44428201-03		OLD	

Signature 	Name and Title Crystal Layton Regulatory Manager	Date 1217/2019
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Data Matrix Endnotes for Permethrin Technical

- ¹ **830.1650** – These data are not required for registration of a technical grade active ingredient. Refer to guideline 830.1620.
- ² **830.6321** – Product is not used around electrical equipment.
- ³ **830.7200** – Product is a liquid.
- ⁴ **830.7370** – No significant acidic or basic moieties
- ⁵ **870.1100** – The study cited is acceptable and satisfies the data requirement as per the Jun. 30, 2017 *Permethrin: Human Health Draft Risk Assessment for Registration Review* (DP Barcode: D414137) (Human Health Risk Assessment).
- ⁶ **870.1200** – The study cited is acceptable and satisfies the data requirement as per the Human Health Risk Assessment.
- ⁷ **870.2400** – The study cited is acceptable and satisfies the data requirement as per the Human Health Risk Assessment.
- ⁸ **870.2500** – The study cited is acceptable and satisfies the data requirement as per the Human Health Risk Assessment.
- ⁹ **870.2600** – The Permethrin RED stated that these data are not required.
- ¹⁰ **850.2100** – The study cited is acceptable and satisfies the data requirement as per the June 20, 2011 *EFED Registration Review Preliminary Problem Formulation for Permethrin* (DP Barcode: D384703) (Problem Formulation) and the RED. Passerine data were required as per the Dec. 12, 2012 *Permethrin Generic Data Call-In* (GDCI-109701-1252) (2012 GDCI). These data were submitted under MRID No. 49511902.
- ¹¹ **850.2200** – The studies cited are acceptable and satisfy the data requirement as per the Problem Formulation.
- ¹² **850.2300** – The studies cited are acceptable and satisfy the data requirement as per the Problem Formulation.
- ¹³ **850.1075** – The studies cited are acceptable and satisfy the data requirement as per the Problem Formulation or the Sept. 30, 2016 *Preliminary Comparative Environmental Fate and Ecological Risk Assessment for the Registration Review of Eight Synthetic Pyrethroids and the Pyrethrins* (DP Barcodes: D425791, D429461, D433338, D433339, D435888) (EFED Risk Assessment).
- ¹⁴ **850.1010** – The studies cited are acceptable and satisfy the data requirement as per the Problem Formulation and the EFED Risk Assessment.
- ¹⁵ **850.1025, 850.1035, 850.1045, 850.1055, 850.1075** – The studies cited are acceptable and satisfy the data requirement as per the Problem Formulation or the EFED Risk Assessment. MRID No. 42584001 is also cited. Additional data were required as per the 2012 GDCI and were submitted under MRID No. 49511901.
- ¹⁶ **850.1300** – The study cited is acceptable and satisfies the data requirement as per the EFED Risk Assessment.
- ¹⁷ **850.1350** – The study cited is acceptable and satisfies the data requirement as per the EFED Risk Assessment.
- ¹⁸ **850.1400** – The study cited is acceptable and satisfies the data requirement as per the Problem Formulation and the EFED Risk Assessment.
- ¹⁹ **850.1400** – These data are not required as per the Problem Formulation and the EFED Risk Assessment.
- ²⁰ **850.1500** – The study cited is acceptable and satisfies the data requirement as per the Problem Formulation.

Data Matrix Endnotes for Permethrin Technical

- ²¹ **850.1710, 850.1730, 850.1850** – The studies cited are acceptable and satisfy the data requirement as per the Problem Formulation and the EFED Risk Assessment.
- ²² **N/A** – The studies cited are acceptable and satisfy the data requirement as per the EFED Risk Assessment.
- ²³ **850.3020** – The study cited is acceptable and satisfies the data requirement as per the Problem Formulation and the EFED Risk Assessment.
- ²⁴ **850.3030** – The study cited is acceptable and satisfies the data requirement as per the Problem Formulation and the EFED Risk Assessment.
- ²⁵ **850.3040** – As per the Problem Formulation, these data are reserved pending the requirement for a refined pollinator risk assessment.
- ²⁶ **870.6200** – The studies cited are acceptable and satisfy the data requirement as per the Human Health Risk Assessment.
- ²⁷ **870.3100** – The studies cited are acceptable and satisfy the data requirement as per the Human Health Risk Assessment.
- ²⁸ **870.3150** – The studies cited are acceptable and satisfy the data requirement as per the Human Health Risk Assessment.
- ²⁹ **870.3200** – The studies cited are acceptable and satisfy the data requirement as per the Human Health Risk Assessment. Note: an invalid MRID was referenced in the Human
- ³⁰ **870.3250** – These data are not required as per the Human Health Risk Assessment.
- ³¹ **870.3465** – The study cited is acceptable and satisfies the data requirement as per the Human Health Risk Assessment.
- ³² **870.6200** – The studies cited are acceptable and satisfy the data requirement as per the Human Health Risk Assessment.
- ³³ **870.4100** – The studies cited are acceptable and satisfy the data requirement as per the Human Health Risk Assessment.
- ³⁴ **870.4200** – The studies cited are acceptable and satisfy the data requirement as per the Human Health Risk Assessment.
- ³⁵ **870.3700** – The studies cited are acceptable and satisfy the data requirement as per the Human Health Risk Assessment.
- ³⁶ **870.3800** – The studies cited are acceptable and satisfy the data requirement as per the Human Health Risk Assessment.
- ³⁷ **870.6300** – These data are not required as per the Human Health Risk Assessment.
- ³⁸ **870.5100** – The study cited is acceptable and satisfies the data requirement as per the RED and the June 15, 2011 *Permethrin: Registration Review Scoping Document for Human Health Assessments* (DP Barcode: D384702) (Scoping Document). The MRID referenced in the Human Health Risk Assessment appears to be an error.
- ³⁹ **870.5385, 870.5395, 870.5450, 870.5550** – The studies cited are acceptable and satisfy the data requirement as per the RED and the Scoping Document. The MRID Nos. referenced in the Human Health Risk Assessment appear to be in error.
- ⁴⁰ **870.7485** – The studies cited are acceptable and satisfy the data requirement as per the RED or the Human Health Scoping Document. MRID Nos. 00065903 and 00102185 are also cited.
- ⁴¹ **870.7600** – The study cited is acceptable and satisfies the data requirement as per the Human Health Risk Assessment.
- ⁴² **870.7800** – These data are not required as per the Human Health Risk Assessment.

Data Matrix Endnotes for Permethrin Technical

- ⁴³ **875.1100, 875.1200, 875.1300, 875.1400, 875.1500, 875.1600, 875.1700** – UPL NA Inc. is a member is good standing of the Agricultural Handler Exposure Task Force (AHETF).
- ⁴⁴ **875.2200, 875.2300, 875.2400, 875.2500, 875.2600, 875.2700, 875.2800, 875.2900, 875.3000** – UPL NA Inc. is a member is good standing of the Agricultural Reentry Task Force (ARTF) and the Outdoor Residential Exposure Task Force (ORETF).
- ⁴⁵ **201-1, 202-1** – UPL NA Inc. is a member is good standing of the Spray Drift Task Force (SDTF).
- ⁴⁶ **890.1100** – The study cited is acceptable and satisfies the data requirement as per the June 29, 2015 EPA Memorandum *Permethrin: Data Evaluation Records (DERs) for EDSP Tier 1 Assays* (DP Barcodes: D398301, D401793, D405670) (EDSP DERs).
- ⁴⁷ **890.1150, 890.1250, 890.1300, 890.1600** – As per the EDSP DERs, this data requirement is not applicable, and the requirement has been satisfied by other scientifically relevant information (OSRI).
- ⁴⁸ **890.1200** – The study cited is acceptable and satisfies the data requirement as per the EDSP DERs.
- ⁴⁹ **890.1350** – The study cited is acceptable and satisfies the data requirement as per the EDSP DERs.
- ⁵⁰ **890.1400** – The study cited is acceptable and satisfies the data requirement as per the EDSP DERs.
- ⁵¹ **890.1450** – The study cited is acceptable and satisfies the data requirement as per the EDSP DERs.
- ⁵² **890.1500** – The study cited is acceptable and satisfies the data requirement as per the EDSP DERs.
- ⁵³ **890.15500** – The study cited is acceptable and satisfies the data requirement as per the EDSP DERs.
- ⁵⁴ **850.4100** – These data were required as per the 2012 GDCI. The study cited was submitted to satisfy the data gap.
- ⁵⁵ **850.4150** – These data were required as per the 2012 GDCI. The study cited was submitted to satisfy the data gap.
- ⁵⁶ **850.4400, 850.4500** – The studies cited are acceptable and satisfy the data requirement as per the EFED Risk Assessment.
- ⁵⁷ **850.4550** – The study cited is acceptable and satisfies the data requirement as per the EFED Risk Assessment.
- ⁵⁸ **835.2120** – The study cited is acceptable and satisfies the data requirement as per the EFED Risk Assessment.
- ⁵⁹ **835.2240** – The study cited is supplemental and additional data were required as per the 2012 GDCI. These data were submitted under MRID No. 49542801.
- ⁶⁰ **835.2410** – The study cited is acceptable and satisfies the data requirement as per the EFED Risk Assessment.
- ⁶¹ **835.4100** – The study cited partially satisfies the data requirement as per the Problem Formulation and additional data were required as per the 2012 GDCI. These data were submitted under MRID No. 49622001.
- ⁶² **835.4200** – The study cited partially satisfies the data requirement as per the Problem Formulation and additional data were required as per the 2012 GDCI. These data were submitted under MRID No. 49728101.
- ⁶³ **835.4300** – The study cited partially satisfies the data requirement as per the Problem Formulation and additional data were required as per the 2012 GDCI. These data were submitted under MRID No. 49624902.
- ⁶⁴ **835.4400** – The study cited partially satisfies the data requirement as per the Problem Formulation and additional data were required as per the 2012 GDCI. These data were submitted under MRID No. 49624903.

Data Matrix Endnotes for Permethrin Technical

- ⁶⁵ **835.1230** – The studies cited partially satisfy the data requirement as per the Problem Formulation and additional data were required as per the 2012 GDCI. These data were submitted under MRID No. 49624901.

From: notification@pay.gov
To: [Crystal Layton/Regulatory/Lake Park](#)
Subject: External :Pay.gov Payment Confirmation: PRIA Service Fees
Date: Tuesday, December 17, 2019 11:44:54 AM



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Your payment has been submitted to the designated government agency through Pay.gov and the details are below. Please note that this is just a confirmation of transaction submission. To confirm that the payment processed as expected, you may refer to your bank statement on the scheduled payment date. If you have any questions or wish to cancel this payment, you will need to contact the agency you paid at your earliest convenience.

Application Name: PRIA Service Fees
Pay.gov Tracking ID: 26M7P47S
Agency Tracking ID: 75908301645

Account Holder Name: UPL NA Inc.
Transaction Type: ACH Debit
Transaction Amount: \$13,888.00
Payment Date: 12/18/2019

Account Type: Business Checking
Routing Number: [REDACTED]
Account Number: *****2762

Transaction Date: 12/17/2019 11:44:46 AM EST
Total Payments Scheduled: 1
Frequency: OneTime

Registration Number: 91813-13
Company Name: UPL Delaware, Inc.
Company Number: 91813
Action Code: R351

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